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June 24, 2011

LOREN J. HARLOW
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VIA HAND DELIVERY

Mr. David Kirn
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Dr. Suite 200
Rancho Cordova, CA 95670-6114

**Re: Bear Valley Water District - Comments on Proposed Renewal
of NPDES Permit No CA0085146 and Time Schedule Order**

Dear Mr. Kirn:

On behalf of Bear Valley Water District (District), we are submitting the following comments on the Proposed Renewal of the NPDES Permit No. CA 0085146 and Time Schedule Order scheduled for public hearing on 3/4/5 August 2011. The proposed renewal contains both a recommended Tentative Permit with a Time Schedule Order and a Tentative Permit Alternative with Time Schedule Order based upon the alternative.

The Tentative Permit contains effluent limitations requiring secondary level treatment with disinfection for discharge to Bloods Creek for the period of 1 January through 30 June. The Tentative Time Schedule Order provides an opportunity for the District to perform studies and complete treatment modifications, if required, to meet the permit requirements. The District has reviewed the Tentative Permit and concurs with the proposed secondary treatment limits for discharge to Bloods Creek. The District's specific comments regarding effluent limits, permit findings, toxicity and the time schedule order are contained in Attachment A.

The Tentative Permit Alternative requires Title 22 tertiary treatment requirements including filtration, coagulation and disinfection for discharges to Bloods Creek. The proposed time schedule order would require the District to comply with the tertiary standards within 5 years of adoption of the order. The District strongly disagrees with both the proposed tertiary treatment alternative and its time schedule order. The District's complete comments and analysis are included in Attachment B. The District's objection to the Tentative Permit Alternative can be briefly summarized as follows:



Mr. David Kim
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Page 2

- The Water Quality Based Effluent Limits (WBELs) are based upon technology equivalent requirements to meet water quality standards. The Tentative Permit Alternative analysis incorrectly establishes Water Quality Objectives (WQOs) for Bloods Creek and does not properly follow the implementation plan contained in the Sacramento San Joaquin River Basin Plan (Basin Plan).
- The Tentative Permit Alternative disregards the recommendation of the California Department of Health (DPH) that secondary treatment with a 20:1 dilution ratio is protective of public health for discharge to Bloods Creek.
- The Tentative Permit Alternative does not consider factors required by California Water Code Section 13241 in setting WQOs in excess of those required in the Basin Plan.

The District appreciates the opportunity to comment on the proposed permit and time schedule order. The District looks forward to working with the Board to ensure that the District's discharge fully protects the beneficial uses of Bloods Creek.

If you have any questions or comments, please contact me.

Very truly yours,

Loren J. Harlow

LJH:mrd
Attachments

cc: Julio Guerra, District Manager, Bear Valley Water District
Gary Ghio, District Engineer

ATTACHMENT A

ATTACHMENT A

Bear Valley Water District Comments to the Tentative Permit and Associated Time Schedule Order

Pursuant to Bear Valley Water District's (District) transmittal letter, the District submits the following comments on the Tentative Permit for the renewal of NPDES NO. CA 00085146.

I. *Tentative Permit Comments & Analysis*

1. *Effluent Limitations for Aluminum, Copper, Lead, and Ammonia*

a. Aluminum

The District requests that the Board re-consider the proposed effluent limits for aluminum based on the recent results of a Water Effect Ratio (WER) study completed by the City of Auburn. The Auburn study indicates that the use of the current USEPA aquatic life criteria for aluminum is overprotective in Central Valley foothill streams. Previous WER studies by the cities of Manteca, Yuba City and Modesto have confirmed that the use of the USEPA aluminum criteria is significantly overprotective for other types of surface waters in the Central Valley. The use of the aluminum WER results for the City of Auburn in the District's permit would be an appropriate and reasonable exercise of the Central Valley Water Board's best professional judgment in interpreting the Basin Plan's narrative objective for toxicity, as it applies to aluminum.

The Board is required when utilizing U.S. EPA's recommended ambient water quality criteria to consider other relevant information to determine their applicability (40 C.F.R., § 122.44(d) (1) (vi) (B)). U.S. EPA's recommended ambient water quality criteria for aluminum includes a recommended 4-day average (chronic) criterion of 87 µg/L, which is based on studies conducted on waters with low pH (6.5 to 6.8) and hardness (<10 mg/L as CaCO₃). As indicated in the Fact Sheet, hardness of Bloods Creek ranges between 10 mg/L and 91 mg/L (Tentative Order, p. F-34). For receiving waters that do not experience such conditions, U.S. EPA indicates that the aluminum criterion of 750 µg/L is protective of aquatic life. Accordingly, the Board should not consider the chronic criterion of 87 µg/L applicable and should use the criterion of 750 µg/L for the protection of aquatic life. Further justification for not applying the chronic criterion would be the extremely rare (when precipitation is at or near a 1-25 year return cycle) and intermittent (continuous daily discharge not required) nature of potential discharge.

b. Copper and Lead

The District requests revisions in the proposed effluent limits for copper and lead. The proposed effluent limits were derived on the assumptions described in Table

F-6 and F-8 of the permit fact sheet. The controlling fraction of effluent as illustrated in these tables in setting the proposed limits was 100% for each trace metal. Since the permit only allows discharge to Bloods Creek during periods of high creek flow where dilution exceeds 20:1, the appropriate effluent fraction to use in effluent limit derivation is 5%. The condition where the effluent fraction would theoretically be 100% will not be allowed under the proposed permit. Use of the 5% effluent fraction values would result in slightly higher effluent limits for copper and lead than are proposed in the Tentative Order. As previously addressed, the application of the chronic criterion is not appropriate in the case of the District due to the extremely rare (when precipitation is at or near a 1-25 year return cycle) and intermittent (continuous daily discharge not required) nature of potential discharge.

c. Ammonia

The ammonia effluent limits are based on an effluent limit value of pH 8.5 (the receiving water objective), since there is no reasonable potential (and therefore no effluent limit) for pH. The District's effluent based upon its water source has low alkalinity and pH values of 7 or lower.

The District requests the Board include a maximum effluent pH of 8.0 for the discharge to Bloods Creek. In the derivation of ammonia effluent limits, a pH value of 8.0 will result in a higher limit.

2. *Numeric WET chronic toxicity trigger*

The District requests reconsideration of the proposed chronic toxicity trigger of 1 TUc. The permit prohibits discharge during periods when dilution in the Bloods Creek is less than 20:1. It is therefore reasonable and appropriate that the chronic toxicity trigger be set at 20 TUc, since toxicity below the trigger will always be protective of the aquatic life uses in the creek and will always result in compliance with the Basin Plan narrative toxicity objective.

The District may be significantly harmed by the use of the proposed 1 TUc toxicity value as a trigger for accelerated monitoring and, depending on the outcome of that testing, a Toxicity Reduction Evaluation. Both the accelerated testing and TRE efforts are costly and resource intensive, especially for a small community such as the District. As a result, this testing and special study should only be required where a violation of the narrative toxicity objective could reasonably be expected to occur. For the District, setting the trigger at 1/20th of the level at which the District's effluent could possibly cause toxicity in the receiving water is not reasonable.

3. *Compliance Schedules for Final Effluent Limits for Aluminum and Ammonia.*

The identified tasks with corresponding due dates contained in schedule are too specific and do not provide needed flexibility. To assure compliance with the Tentative Order,

the District requests that the compliance schedule provisions be revised by eliminating tasks v, vi, vii, and viii. This level of detail is appropriate for inclusion in the District's Method of Compliance Work plan/Schedule but should not be included in the Tentative Order.

4. *i. Domestic Supply and Agricultural Supply. Page F-17*

This finding is not reflective of actual domestic and agricultural supply beneficial uses on Bloods Creek.

Page F-17 of the Fact Sheet Section in Section IV.C.2.a.i., states:

“In addition, the State Water Board has issued water rights to existing water users along Bloods Creek and the North Fork Stanislaus River downstream of the discharge for domestic and irrigation uses”. However, the water rights cited in the TWDR Fact Sheet Section IV.C.2.a.i. are upstream of the BVWD discharge point.¹

Also at page F-17, Fact Sheet Section IV.C.2.a.i. incorrectly asserts: “In addition to existing uses, growth in the area downstream of the of the discharge is expected to continue, which presents a potential for increased domestic and agricultural uses of the water in Bloods Creek.”

The probability that new water rights will be secured on Bloods Creek downstream of the BVWD discharge point is low because the Stanislaus River and its tributaries, including Bloods Creek, are listed on the most recent (November 19, 1998) State Water Resources Control Board Declaration of Fully Appropriated Streams. Furthermore, lands downstream of the discharge are U.S. Forest Service property managed as forest habitat and no new uses are anticipated.²

The nearest water right, F006737S, of 100 gallons per day held by the United States Forest Service on the North Fork of the Stanislaus River at Sand Flat Campground is approximately 4 miles downstream of the discharge point.³

Boy Scout Camp Wolfboro, located downstream of the Sand Flat Campground, uses well water. The next downstream rights available for consumptive use are over 10 miles downstream from the discharge point, and the only active one is approximately 21 miles

¹ See attached letter date June 22, 2011 from Condor Earth Technologies by John H. Kramer, PhD, Certified Hydrogeologist No, 182. (Attachment A 1)

² Ibid.

³ See attached memorandum from Julio Guerra, District Manager, dated 16 April 2011 analyzing existing water rights on Bloods Creek and letter date June 22, 2011 from CondorEarth Technologies by John H. Kramer, PhD, Certified Hydrogeologist No, 182.(Attachment A 2)

downstream. This take out point is for raw water subsequently treated at certified treatment plants operated by UPUD, the City of Angels Camp and CCWD⁴.

The area downstream of the BVWD discharge is public forest lands for tens of miles with no potential for private development. This fact was documented in an EIR certified by Alpine County (SCH#2006012049) and accepted by the State Water Resources Control Board – Division of Water Rights in their Decision 1648 dated March 17, 2009. Water uses that could be measurably affected by BVWD discharges are fixed and will not increase in any significant manner.⁵

5. i. *Water Contact and Non-contact Recreation.* Page F-18

This finding is not reflective of actual water contact and non-contact beneficial uses on Bloods Creek during the permitted discharge period.

F-18, the Fact in Section IV.C.2.a.ii., the Tentative Permit states: “There is ready public access to Bloods Creek, exclusion of the public is unrealistic and contact recreation activities currently exist along the North Fork Stanislaus River (downstream of discharge point) and these uses are likely to increase as the population in the area grows.”

The conclusion that Bloods Creek and the downstream recreational uses on the North Fork and main stem of the Stanislaus are readily accessible is generally not true at times of permitted discharge to Bloods Creek (1 January through 30 June). At these times, recreational use is dominated by cross country skiers who do not contact the flowing stream. Trails close when conditions are too wet. Nearest vehicle access to the Bloods Creek drainage downstream of the District’s discharge is a campground operated by the Northern California Power Authority near the crossing of the Spicer Access Road approximately 2.5 miles downstream of the discharge point. This campground is closed to public access until June. Prior to that time accumulated snow typically restricts access to the stream. Furthermore it is very unlikely that early season recreational users in June would experience exposure to Bloods Creek due to high flows and cold water temperatures⁶

6. iii. *Groundwater Recharge.* Page F-18

The finding indicates it is reasonable to assume that Bloods Creek would contribute to groundwater recharge. The finding should be reflective of the permitted discharge period.

⁴ Ibid. 1.

⁵ Ibid 1.

⁶ Ibid, 1

While it is true at times that groundwater elevation is below the bottom of the creek, it should not be cited in a fact sheet to suggest that the District's discharges to the creek threaten groundwater quality. The District's discharges would occur only rarely during annual snowmelt prior to 1 July, when the ground is completely saturated. Any discharge would not have an opportunity to affect groundwater because Bloods Creek will be a gaining stream with positive flow into the creek from groundwater throughout its reach during the District discharge events.⁷

7. *i. Hardness-dependent CTR Metals. Page F-20*

This finding references Sacramento Superior Court Order (Case No. 34-2009-80000309). The District was not a party to this decision. This order is not citable and is only applicable to the parties involved in the litigation.

8. *(a) WQO. Page F-41*

The statement in the last paragraph of page F-41 : "Consequently, Order No R5-2005-0139 included Title 22-level limitations for discharges to the storage/polishing reservoir, including a 7-day median limitation for total coliform organisms of 2.2 MPN/100 mL" is not reflective of the Order No R5-2005-0139 (Order) findings.

The Order No R5-2005-0139 contains no findings reflecting concerns raised by the DPH on April 13, 2005. In finding 24 of the Order on pages 15-16 under the heading **Pathogens**, the Board found:

"The DHS has recommended that secondary treatment with a minimum dilution of 20:1 provides an equivalent protection of human health as does tertiary treatment. Therefore, the Discharger is required to establish an in-stream flow measuring system so that the effluent discharge rate can be controlled to comply with a 30-day average effluent dilution ration of at least 20:1. The BOD and TSS effluent limitations for secondary treatment with a dilution of 20:1 are set at 30 mg/l as a monthly average and the total coliform organisms limitation is 23 MPN/100 ml as a 7-day median."

The only reference in the Order to tertiary treatment standards are for a discharge to unrestricted recreational impoundments.

40 CFR 122.45(a) prohibits effluent limitations on internal waste streams unless it is infeasible to apply effluent limitations at the outfall. It is more reasonable based upon the Order's findings and 40 CFR 122.45(a) that the storage reservoir was incorrectly assumed to be a recreational impoundment subject to Title 22 standards.

⁷ Ibid. 1.

9. *3. Satisfaction of Anti-Backsliding Requirements. Pages F50 & F51*

The statement in the last paragraph on page F-51: “*The requirements were established based on a 13 April 2005 recommendation from DPH*” as discussed in comment F. above, is not reflective of the Order.

II. *Time Schedule Order Accompanying Tentative Permit*

1. *Copper and Lead Effluent Limitations*

- a. The identified tasks with corresponding due dates contained in schedule are too specific and do not provide needed flexibility. To assure compliance with the Tentative Order, the District requests that the compliance schedule provisions be revised by eliminating tasks iv, v, vi, and vii. This level of detail is appropriate for inclusion in the District’s Method of Compliance Work plan/Schedule but should not be included in the Tentative Order.
- b. Task iv. and v. have different compliance dates for construction of treatment plant upgrades and/ or diffuser than contained in the compliance schedule for compliance with effluent limits for Aluminum and Ammonia. These dates need to be coordinated since they will not be separate projects. The dates of compliance if included should be the same as for Aluminum and Ammonia.

A-1



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Condor Project No. 6204

June 22, 2011

Directors
Bear Valley Water District
P.O. Box 5027
Bear Valley, CA 95223

RE: Comments on memoranda from General Manager Julio Guerra
Memorandum on Water Rights dated 16 April 2011
Memorandum on Recreation Survey dated 21 April 2011

Dear Sirs:

In accordance with the agreement between Condor Earth Technologies, Inc. (Condor) and the Bear Valley Water District (BVWD) dated June 13, 2011, Condor provides this review and analysis of memoranda prepared by the General Manager of BVWD concerning water rights and recreational uses in the vicinity of the BVWD discharge point. Condor understands the memoranda were prepared to support comments on Tentative Waste Discharge Requirements (TWDR) circulated by staff of the Regional Water Quality Control Board.

For this work Condor reviewed the following documents.

1. *Memorandum Water Rights 16 April 2011* from General Manager to Loren Harlow, Special Counsel, Stoel-Rives
2. *Memorandum Recreational Survey 21 April 2011* from General Manager to Loren Harlow, Special Counsel, Stoel-Rives, without attachments.
3. Letter from Loren Harlow to Dr. James D. Marshall, P.E. dated April 29, 2011.
4. *Notice of Public Hearing concerning Renewal of Waste Discharge Requirements (WDR) National Pollutant Discharge Elimination System (NPDES) Permit No. CA0085146 and Time Schedule Order for Bear Valley Water District Wastewater Treatment Plant*, part specifying comment submittal by June 24.
5. *Tentative Time Schedule Order for Bear Valley Water District Wastewater Treatment Plant, and Tentative TSO Alternative*, Findings 1-30 only.
6. *Tentative Waste Discharge Requirements for the Bear Valley Water District Order No. R5-2011-XXXX NPDES No. CA0085146*, Fact Sheet Section IV.A.5. and Sections IV.C.2.a.i, ii, and iii, only.
7. *Declaration of Fully Appropriated Stream Systems*, November 19, 1998. California State Water Resources Control Board

Project Understanding and Qualifications

Condor understands the District desires a third party to verify factual information provided by the General Manager to support comments to be submitted by June 24, 2011. Condor is

qualified for this work. Condor has appropriate California Licensed Professionals familiar with water rights and recreation in the Bear Valley area. Specifically, Condor prepared an Environmental Impact Report for the County of Alpine and Lake Alpine Water Company Petition for Partial Assignment of State-Filed Application 5648, Petitions to Change State-Filed Application, and Application 31523 related to water rights within the BVWD service area. Condor prepared accurate and objective analysis certified by Alpine County in compliance with the California Environmental Quality Act. Analysis included cumulative impacts on downstream municipal, recreational and agricultural users. Condor provided expert testimony at a subsequent water rights public hearing before the State Water Resources Control Board.

Memorandum Water Rights dated 16 April 2011

Condor reviewed Mr. Guerra's research on water rights downstream of the BVWD outfall. His supporting documents include maps from the California State Water Resources Control Board's eWRIMS (Electronic Water Rights Information Management System), and copies of documents pertaining to the water rights listed in the Table "Water Rights Summary Stanislaus River" accompanying his memorandum. Condor confirmed the locations and distances cited in his memorandum and concurs with his other findings.

The water rights cited in the TWDR Fact Sheet Section IV.C.2.a.i. is upstream of the BVWD discharge point. The probability that new water rights will be secured on Bloods Creek downstream of the BVWD discharge point is low because the Stanislaus River and its tributaries, including Bloods Creek, are listed on the most recent State Water Resources Control Board Declaration of Fully Appropriated Streams, dated November 19, 1998. Furthermore, lands downstream of the discharge are U.S. Forest Service property managed as forest habitat and no new uses are anticipated. Fact Sheet Section IV.C.2.a.i. asserts that "In addition to existing uses, growth in the area downstream of the discharge is expected to continue, which presents a potential for increased domestic and agricultural uses of the water in Bloods Creek." The area downstream of the BVWD discharge is public forest lands for tens of miles with no potential for private development. This fact was documented in an EIR certified by Alpine County (SCH#2006012049) and accepted by the State Water Resources Control Board – Division of Water Rights in their Decision 1648 dated March 17, 2009. We conclude that water uses that could be measurably affected by BVWD discharges are fixed and will not increase in any significant manner.

The nearest existing legal water right is held by the U.S. Forest Service for 100 gallons a day on the North Fork of the Stanislaus River at Sand Flat Campground, approximately 4 miles downstream of the BVWD discharge point. This campground is typically not used during high runoff in May and June when BVWD might need to discharge. The nearby Boy Scout Camp Wolfboro uses well water. The next downstream rights available for consumptive use are over 10 miles downstream from the BVWD discharge point, and the only active one is approximately 21 miles downstream. This take out point is for raw water subsequently treated at certified treatment plants operated by Union Public Utility District (UPUD), the City of Angels Camp, and Calaveras County Water District (CCWD). The potential for BVWD discharges to degrade these waters is insignificant.

As a general observation, the hydrology of the area at times when BVWD discharges would occur is characterized by high flows dominated by snowmelt runoff with frothy whitewater for tens of miles, providing aeration and dilution many times the NPDES 20:1 requirement.



Memorandum Recreation Survey 21 April 2011

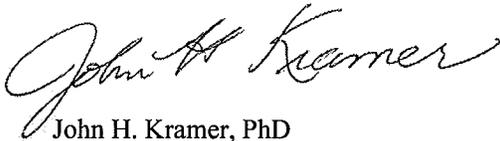
Condor reviewed Mr. Guerra's memorandum and back-up data, including photographs of private property postings and road closure and parking restrictions. Mr. Guerra's memorandum is factually correct and describes restricted public access on private land through the cow pasture and meadow downstream of the discharge point to the U.S. Forest Service boundary. These areas are identified in TWDR, Section IV.C.2.a.ii. as having ready public access. The contention that Bloods Creek and the downstream recreational uses on the North Fork and main stem of the Stanislaus are readily accessible is generally not true at times of permitted discharge to Bloods Creek (December 31 through July 1). At these times, recreational use is dominated by cross country skiers who do not contact the flowing stream. Trails close when conditions are too wet. Nearest vehicle access to the Bloods Creek drainage downstream of the BVWD discharge is at a campground operated by the Northern California Power Authority near the crossing of the Spicer Access Road, approximately 2.5 miles downstream of the discharge point. This campground is closed to public access until June. Prior to that time accumulated snow typically restricts access to the stream. Furthermore, it is very unlikely that early season recreational users in June would experience exposure to Bloods Creek due to high flows and cold water temperatures.

Comments on Groundwater Recharge

In reviewing the TWDR related to water rights and uses downstream of the BVWD discharge location, Condor noted that the Fact Sheet Section IV.C.2.a.iii indicated it is reasonable to assume that Bloods Creek would contribute to groundwater recharge. While this conjecture is true at times when groundwater elevation is below the bottom of the creek, it should not be cited in a fact sheet to suggest that BVWD discharges to the creek threaten groundwater quality. BVWD discharges would occur only rarely during annual snowmelt prior to July 1, when the ground is completely saturated. Any BVWD discharges would not have an opportunity to affect groundwater because Bloods Creek will be a gaining stream with positive flow into the creek from groundwater throughout its reach during BVWD discharge events.

Respectfully submitted,

CONDOR EARTH TECHNOLOGIES, INC



John H. Kramer, PhD
California Certified Hydrogeologist No. 182



ATTACHMENT B

B-1

**Bear Valley Water District
Memorandum
Water Rights
16 April 2011**

From: General Manager
To: Loren Harlow, Special Counsel, Stoel-Rives
Subject: Water Rights Review
CC: Directors
Gary Ghio, District Engineer

Loren,

Per your request I have researched the matter of potential water users downstream of our facilities on Bloods Creek, the North Fork of the Stanislaus River, and the main stem of the Stanislaus River.

In the process I have reviewed the 14 December 1929 San Joaquin County Superior Court decision on Stanislaus River water rights, the September 1997 SWRCB Order, 97-05, issued to CCWD to update water rights in the Stanislaus watershed, SWRCB Water Right Order 98-08 of 19 November 1998 which updated the Declaration of Fully Appropriated Stream Systems, the SWRCB public record on individual Stanislaus watershed water rights, and SWRCB Decision 1648 which modified water rights held by the Lake Alpine Water Company.

To summarize my findings

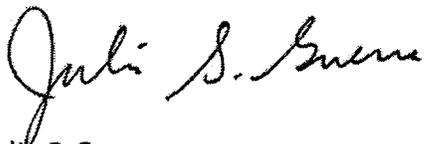
1. There are no existing water rights or any evidence of users on Bloods Creek downstream of our discharge point;
2. The confluence of Bloods Creek and the North Fork of the Stanislaus River is approximately 3.212 miles downstream of our discharge point;
3. There is a USFS water right, F006737S, to 100 gallons per day from the North Fork of the Stanislaus at a point approximately 0.8 miles downstream of the Bloods Creek confluence, or about 4 miles from our discharge point;
4. CCWD has a water right, A012912, on the North Fork of the Stanislaus approximately 11.442 miles from our discharge point, but, according to Bill Perley, Operations Director, there are no plans to exercise this right;
5. USFS has another water right, F006735S, to 14,410 gallons per day, approximately 16.4 miles downstream of our discharge point. This one is listed as source unspecified, but may be from the North Fork of the Stanislaus;

6. CCWD has a water right, A012912A_02, on the North Fork of the Stanislaus approximately 18 miles from our discharge point, but according to Bill Perley, Operations Director, there are no plans to exercise this right;
7. At approximately 21.7 miles from our discharge point is the McKay's Point Diversion Dam on the North Fork of the Stanislaus, one of two diversion points to the Collierville Tunnel (the other is from Beaver Creek). CCWD has water right A012912A_01, this one is for 3 CFS and is conjunctively used with water right A019148 that authorizes CCWD to divert 340 CFS from Beaver Creek to the dam. This basically squares with Bill Perley's verbal communication to me that the North Fork is only relied on 3 days of the year for their water supply. An additional, non-consumptive water right pertains to this location, S016205, held by the Northern California Power Authority.

The next downstream water rights identified were on the main stem of the Stanislaus River at New Melones Reservoir. Upstream of the Bloods Creek confluence with the North Fork of the Stanislaus there is hydroelectric power generation at Utica, Union, and Spicer Reservoirs, consequently there are additional water rights held by Northern California Power Authority, Utica Power Authority, and CCWD in conjunction with that activity.

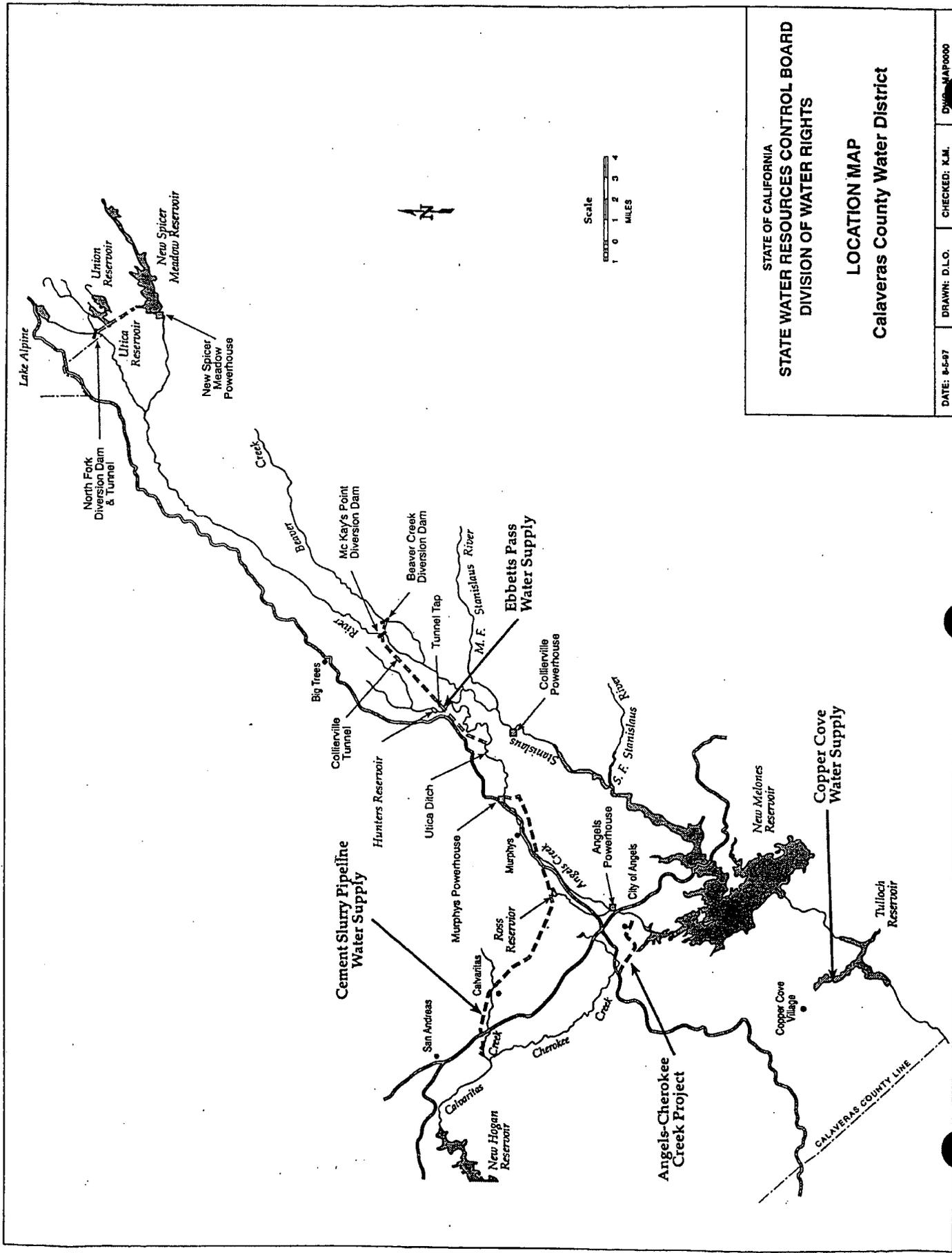
In closing, no water rights holders were identified on Bloods Creek. No agricultural withdrawals were identified on the Stanislaus River above New Melones Reservoir; the Oakdale Irrigation District and Stockton East Water District withdraw water from New Melones Reservoir or even further downstream.

Additionally, in the course of this investigation, we have been assured by Bill Perley, Operations Manager for CCWD that they support our efforts and will not challenge our NPDES renewal if tertiary standards are not implemented.



Julio S. Guerra
General Manager

Attachment



STATE OF CALIFORNIA
 STATE WATER RESOURCES CONTROL BOARD
 DIVISION OF WATER RIGHTS

LOCATION MAP
 Calaveras County Water District

DATE: 8-5-87 DRAWN: D.L.O. CHECKED: K.M. DWG. MAP0000

**WATER RIGHTS SUMMARY
STANISLAUS RIVER**

POD_ID	APPL_ID	APPL_POD	SOURCE_NAME	COUNTY	QUAD_MAP_NAME	DIRECT_DIV_Amount	DIVERSTO_N_STORAGE_Amount	DIVERSTO_N_Acft	P_PLACE_ID	POD_STAT	FACE_VAL	DIVERSIO_N_TYPE	WR_STATU	STORAGE_TY	POD_UNIT	LAST_NAME
32259	F0067375	F0067375_01	NORTH FORK STANISLAUS RIVER	Calaveras	TAMARACK	100	0	0	692593	Active	0	Direct	Claimed	Diversion point	Gallons per Day	USFS
25701	A012912	A012912_01	NORTH FORK STANISLAUS RIVER	Tuolumne	BOARDS CROSSING	7	0	0	682304	Active	3373.9	Storage	Permitted	Diversion point	Cubic Feet per Second	CCWD
9352	F0067355	F0067355_01	UNSP	Tuolumne	BOARDS CROSSING	14400	0	0	665841	Active	0	Storage	Claimed	Diversion point	Gallons per Day	USFS
34771	A012912A	A012912A_02	NORTH FORK STANISLAUS RIVER	Tuolumne	DORINGTON	3	0	0	691374	Active	1446	Storage	Permitted	Diversion point	Cubic Feet per Second	CCWD
34772	A012912A	A012912A_01	NORTH FORK STANISLAUS RIVER	Tuolumne	STANISLAUS	3	0	0	691375	Active	1446	Storage	Permitted	Diversion point	Cubic Feet per Second	CCWD
17709	A001081	A001081_01	STANISLAUS RIVER	Calaveras	MELONES DAM	0	96195	0	674303	Active	96195	Storage	Licensed	Diversion point	Gallons per Day	OID
31721	A002460	A002460_01	STANISLAUS RIVER	Calaveras	MELONES DAM	1500	132450	0	692055	Revoked	0	Direct	Revoked	Diversion point	Cubic Feet per Second	
6455	A002524	A002524_01	STANISLAUS RIVER	Calaveras	KNIGHTS FERRY	0	36000	0	661232	Active	36000	Storage	Licensed	Diversion point	Gallons per Day	SSJD
12197	A003091	A003091_01	STANISLAUS RIVER	Calaveras	MELONES DAM	0	10754	0	671465	Active	10754	Direct	Licensed	Diversion point	Gallons per Day	OID
43516	A005648	A005648_01	STANISLAUS RIVER	Calaveras	MELONES DAM	0	0	0	701942	Active	0	Storage	State Filing	Diversion point	Gallons per Day	SWRCB
34427	A010872	A010872_01	STANISLAUS RIVER	Tuolumne	MELONES DAM	0	80000	0	691030	Active	80000	Direct	Licensed	Diversion point	Gallons per Day	OID
38020	A010978	A010978_01	STANISLAUS RIVER	Calaveras	MELONES DAM	0	25000	0	693024	Active	25000	Diversion	Licensed	Diversion point	Gallons per Day	OID
34899	A013310	A013310_01	STANISLAUS RIVER	Tuolumne	MELONES DAM	1500	80000	0	694167	Active	1165966.3	Storage	Licensed	Diversion point	Cubic Feet per Second	OID
22891	A014858	A014858_01	STANISLAUS RIVER	Calaveras	MELONES DAM	8800	0	0	677895	Active	0	Direct	State Filing	Diversion point	Cubic Feet per Second	SWRCB
25944	A014858A	A014858A_01	STANISLAUS RIVER	Calaveras	MELONES DAM	0	980000	0	682547	Active	980000	Storage	Permitted	Diversion point	Gallons per Day	USBR
11665	A014858B	A014858B_01	STANISLAUS RIVER	Calaveras	MELONES DAM	2250	0	1000000	670933	Active	1000000	Storage	Permitted	Diversion point	Cubic Feet per Second	USBR
11664	A014858B	A014858B_02	STANISLAUS RIVER	Calaveras	KNIGHTS FERRY	2250	0	1000000	670932	Active	1000000	Storage	Permitted	Diversion point	Cubic Feet per Second	USBR
11667	A014858B	A014858B_03	STANISLAUS RIVER	Calaveras	MELONES DAM	2250	0	1000000	670935	Active	1000000	Storage	Permitted	Diversion point	Cubic Feet per Second	USBR
28621	A014859	A014859_01	STANISLAUS RIVER	Calaveras	MELONES DAM	6000	980000	0	687899	Active	5323865	Storage	Permitted	Diversion point	Cubic Feet per Second	USBR
28979	A019303	A019303_01	STANISLAUS RIVER	Calaveras	MELONES DAM	0	1420000	0	688246	Active	1420000	Storage	Permitted	Diversion point	Gallons per Day	USBR
12002	A019304	A019304_01	STANISLAUS RIVER	Calaveras	MELONES DAM	0	1420000	0	671270	Active	1420000	Storage	Permitted	Diversion point	Gallons per Day	USBR
4120	A026791	A026791_01	STANISLAUS RIVER	Calaveras	KNIGHTS FERRY	1800	0	0	663464	Active	1303159.5	Direct	Permitted	Diversion point	Cubic Feet per Second	OID
26981	A027319	A027319_01	STANISLAUS RIVER	Calaveras	MELONES DAM	4000	0	0	686249	Active	2895910	Direct	Permitted	Diversion point	Cubic Feet per Second	USBR
21620	A030603	A030603_01	STANISLAUS RIVER	Calaveras	MELONES DAM	750	155000	252000	680888	Canceled	407000	Storage	Cancelled	Diversion point	Cubic Feet per Second	SEWD
21619	A030603	A030603_02	STANISLAUS RIVER	Calaveras	KNIGHTS FERRY	750	155000	252000	680887	Canceled	407000	Storage	Cancelled	Diversion point	Cubic Feet per Second	SEWD

B-2

**Bear Valley Water District
Memorandum
Recreation Survey
21 April 2011**

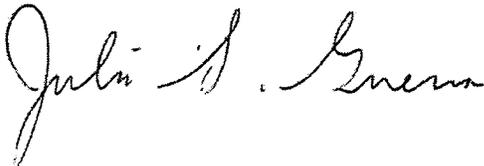
From: General Manager
To: Loren Harlow, Special Counsel, Stoel-Rives
Subject: Recreation Survey
CC: Directors
Gary Ghio, District Engineer

Loren,

Per your request I have researched the matter of potential recreation downstream of our facilities on Bloods Creek.

To answer your questions, there is no general public access through the private property that Bloods Creek flows through directly downstream of the discharge point. The meadows referred to in the draft permit are on the private property adjacent to our facilities and public access is prohibited. Then there is National Forest Land that begins approximately 1 mile downstream of our facilities. There is public access and camping in the vicinity of where the Spicer Road is traversed by the creek, about 2.4 miles downstream, for about a 0.8 mile reach to the Bloods Creek confluence with the North Fork of the Stanislaus. The Wolfeboro Boy Scout Camp is downstream from this point another 0.8 miles.

The overriding considerations in this regard are that, during our discharge season, which will of necessity occur following very heavy winters, with streams at maximum dilution, and snow still melting, there will be no camping, and, access on Spicer Road is restricted to Snow Park permit holders until 1 June in any case.



Julio S. Guerra
General Manager

B-3



**BEAR VALLEY
WATER DISTRICT**
P.O. Box 5027
Bear Valley, CA 95223
(209) 753-2112

BOARD OF DIRECTORS:
JIM D. BISSELL
PHILL A. COFFMAN
JOHN R. DRALLA
BARBARA J. GOODRICH
JERRY J. NELSON

February 1, 2011

Jim Marshall
Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

RE Bear Valley Water District
NPDES Application

Jim, as discussed during our telephone conversation last week, the District's current Waste Discharge Requirements No. 05-10-2008 impose a maximum annual average Wastewater Treatment Plant (WWTP) influent flow of 100,000 GPD (36.5 MG/YR). Based upon this limitation I have revised the District's water balance projections to provide some guidance on the likelihood of required Bloods Creek discharge under the various precipitation water year assumptions. To this end, please find the following attached items:

1. Summary of Wastewater Treatment Plant Influent Flows 2001 through 2010.
2. Water Year 2010 Average Year Precipitation Water Balance Projection.
3. Water Year 2010 1-in-5 Year Precipitation Water Balance Projection.
4. Water Year 2010 1-in-10 Year Precipitation Water Balance Projection.
5. Water Year 2010 1-in-25 Year Precipitation Water Balance Projection.
6. Water Year 2010 1-in-50 Year Precipitation Water Balance Projection.
7. Water Year 2010 1-in-100 Year Precipitation Water Balance Projection.

The attached Water Balance Projections were developed by the District's previous Engineer, ECO:LOGIC, in support of the District's original NPDES permit. The assumptions on precipitation levels, percolation, evaporation, spray disposal levels, etc. contained in the Projections are consistent with the previous Projections approved by the Regional Board as part of the NPDES permit application process.

In order to determine a monthly distribution of the 100,000 GPD average daily influent flows, actual WWTP influent flows for 2001 through 2010 were analyzed to determine the average monthly percentage of the annual flow. These percentages were then utilized to develop the distribution of anticipated influent flows based upon the 100,000 GPD yearly average limit. This information is contained in Item 1 attached. In addition it should be noted the 10 year average yearly flow from 2001

to 2010 was approximately 26.4 MG per year with a peak of approximately 31.9 MG in 2005 which was an approximate 1-in-10 year precipitation event for both total rainfall and snow water content. It should also be noted the year 2006 was a 1-in-100 year total precipitation event although the snow water content was a 1-in-5 year precipitation event. The following is a summary of predicted required discharges to Bloods Creek based upon each water year precipitation assumption:

Water Year Precipitation	Discharge to Bloods Creek (MG)
Average Year	0
1-in-5 Year	0
1-in-10 Year	0
1-in-25 Year	9
1-in-50 Year	18
1-in-100 Year	54

As is evident from the above summary, the District does not anticipate discharges to Bloods Creek with the current WDR limitation of 100,000 GPD yearly average WWTP influent flow until the water precipitation year approaches or exceeds the 1-in-25 year precipitation level. This has also been verified during the past ten years during which time no discharges were required to Bloods Creek.

Due to the unique environmental setting of the Bear Valley Water District's facilities, the majority of treated effluent in the District's polishing pond consists of water from precipitation or snow influx directly in the treatment/polishing ponds. Based upon the 1-in-25 year, 1-in-50 year, and 1-in 100 year Projections, the amount of actual wastewater contained in any potential discharge is projected to be approximately 30%. Combining this already diluted wastewater with the proposed NPDES requirement of 20:1 dilution for any discharge to Bloods Creek would result in actual dilution levels of approximately 69:1 for any potential discharge.

Due to the current state of the economy, significant growth within the Bear Valley Water District is not anticipated during the next five years. As is evident from the summary of flows from 2001 through 2010, the District's current WWTP influent flows are considerably less than the permitted maximum per the District's WDRs. Any anticipated growth during this time period would not result in the District exceeding its WDR limitations.

As is evident from the accompanying analysis, discharge to Bloods Creek is not anticipated except in events exceeding the 1-in-25 year precipitation year and at dilution levels that far exceed the proposed NPDES requirement of 20:1. For the Department of Public Health to recommend a requirement that the District construct a tertiary treatment plant in order to discharge to Bloods Creek is extremely unreasonable given the anticipated need for this discharge being only in water year events of greater than in 1-in-25 years and projected high dilution levels. The imposition of this requirement would place an undue financial burden on the rate payers of the District without any significant benefit to the District users or any potential downstream water users due to the anticipated, infrequent use of the Bloods Creek discharge itself.

Should you require any additional information, please contact me at your convenience.



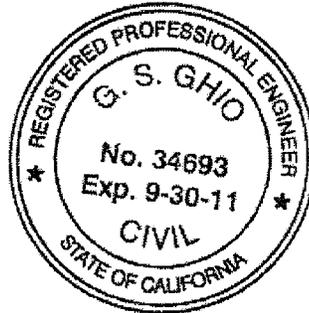
Gary S. Ghio, District Engineer

Attachments

Cc Julio Guerra, District Manager
BVWD Board of Directors

#2322/nlm

Marshall_Letter_2-1-11



**BEAR VALLEY WATER DISTRICT
WWTP INFLUENT FLOWS 2001 THRU 2010
1/26/2011**

	2010	2009	2008	2007	2006	2005	2004	2003	2002	2001	AVG. DAILY FLOW (GAL/DAY)	MONTHLY PERCENTAGE OF ANNUAL FLOW	100,000 GPD YEAR AVG. MONTHLY FLOW	100,000 GPD YEAR AVG. DAILY FLOW
	(MG)	(GAL/MONTH)	(GAL/DAY)											
DEC	2.395	1.166	1.144	1.088	1.300	2.404	2.658	1.375	1.629	1.831	1.699	54809	2346835	75704
NOV	0.875	0.480	0.650	0.522	0.860	0.909	1.073	0.858	1.179	0.852	0.826	27526	1140622	38021
OCT	0.923	0.677	0.565	0.700	0.833	0.832	0.870	0.953	0.984	0.834	0.817	26362	1128791	36413
SEPT	0.864	0.815	0.766	1.228	0.814	1.035	1.003	1.178	1.269	1.035	1.001	33355	1382160	46072
AUG	1.554	1.379	1.500	1.517	1.085	1.708	1.618	1.938	1.941	2.108	1.635	52732	2257934	72837
JULY	2.365	1.618	1.472	1.593	1.143	2.283	1.568	2.125	1.989	2.001	1.816	58570	2507875	80999
JUNE	4.845	1.963	2.071	1.792	2.079	3.900	1.755	2.460	2.280	1.746	2.489	82969	3438008	114600
MAY	5.584	4.597	4.391	3.328	5.078	6.945	2.958	4.280	4.539	3.816	4.551	146822	6286757	202799
APRIL	3.599	4.461	4.815	3.837	3.551	4.015	4.420	3.250	5.549	4.113	4.161	138702	5747452	191582
MARCH	1.806	3.105	1.972	3.214	3.071	3.275	3.975	3.597	3.109	2.744	2.987	96349	4125557	133082
FEB	1.369	1.732	1.321	1.528	3.551	2.448	1.842	3.120	2.862	1.765	2.154	76918	2974814	106243
JAN	1.368	1.594	4.815	1.315	3.086	2.135	1.752	2.658	2.366	1.812	2.290	73874	3163195	102039
TOTAL:	27.546	23.587	25.483	21.662	26.450	31.887	25.492	27.792	29.696	24.657	26.425		36500000	

10 YEAR AVERAGE YEARLY FLOW: 26.425 MG

BEAR VALLEY WATER DISTRICT WASTEWATER TREATMENT AND DISPOSAL SYSTEM
 Water Year 2010 Average Year Precipitation Water Balance Projection Assuming 100,000 GPD Yearly Average WWTP Inflow Per BWWD existing WDR #5-10-2008

INPUT DATA

TREATMENT POND CHARACTERISTICS	STORAGE RESERVOIR												IRRIGATION AREA CHARACTERISTICS												CLIMATOLOGICAL FACTORS																
	PARAMETER / MONTH	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL	PARAMETER / MONTH	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL	PARAMETER / MONTH	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP
GROSS AREA (ac)	3.2													DISTRICT DISPOSAL LAND (AC)	21.3													PRECIPITATING PRECIP RATIO	1.00												
WATER SURFACE AREA (ac)	2.9													SOIL WATER DEFICIT BEFORE IRRIGATION (IN)	14.7													OCT-APR EVAP/AVG EVAP RATIO	n/a												
FRACTION OF ESTIMATED PERC RATE	0.1													FRACT OF LAND IRRIGATED	106												MAY-SEP EVAP/AVG EVAP RATIO	1.00													
DAYS IN MONTH	31	31	31	31	31	28	31	31	31	30	31	31	30	FRACTION OF EST. PERC RATE	1.0												PAN COEFFICIENT	n/a													
AVG PAN EVAP (IN)	3.05	0.89	0.61	0.76	0.76	0.83	2.14	3.69	5.34	6.64	7.63	6.87	5.17	43.62												LAND PRECIP COLLECTED (FRAC)	0.9														
AVG PRECIP (IN)	2.3	5.3	7.5	9.3	7.5	3.8	3.8	1.8	1.8	0.6	0.1	0.2	0.7	46.0																											
ESTD. SNOW ACCUM (IN Water)	2	5	12	22	26	33	33	27	27	9	0	0	0	241.4																											
ESTIMATED MAX PERCOLATION (IN) _{est}	8.6	18.1	11.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0																												
PROJECTED INFLUENT FLOW (Avg. GAL/D)	36,413	38,021	75,704	102,039	106,243	133,082	191,582	202,789	114,600	80,899	72,837	46,072																													

CALCULATIONS

PARAMETER / MONTH	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL
WASTEWATER VOLUME (gal)	1,128,791	1,140,822	2,346,835	3,163,195	2,974,814	4,125,557	5,747,452	6,286,757	3,438,008	2,507,875	2,257,934	1,382,160	36,500,000
EVAPORATION (IN)	2.4	0.7	0.5	0.6	0.7	1.7	3.0	4.3	5.3	6.1	5.5	4.1	34.9
PRECIPITATION (IN)	2.3	5.3	7.5	9.3	7.5	3.8	3.8	1.8	0.6	0.1	0.2	0.7	46.0
TREATMENT PONDS													
PERCOLATION (IN)	0.9	1.8	1.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	24.1
PERC VOLUME (gal)	67,440	142,484	88,407	0	0	0	0	0	0	0	0	0	1,900,808
EVAP. VOLUME (gal)	188,994	55,123	39,374	47,248	55,123	133,871	236,242	338,614	417,361	480,359	433,111	322,864	2,748,285
PRECIP. VOLUME (gal)	197,982	456,219	645,593	800,536	645,593	593,946	327,101	154,942	51,647	8,608	17,216	60,255	3,959,638
TREATMENT DISPOSAL GAIN (gal)	58,452	(258,612)	(517,812)	(753,287)	(590,470)	(460,075)	(90,858)	183,672	365,714	471,751	1,034,129	1,246,932	689,555
STORAGE RESERVOIR													
PERCOLATION (IN)	8.56	18.09	11.23	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	241.39
PERC VOLUME (gal)	360,454	761,555	472,522	0	0	0	0	0	0	0	0	0	32,864,142
W.S. AREA (ac) _{est}	1.55	1.55	1.55	1.55	1.55	2.47	6.02	10.36	12.41	12.84	12.2	1.55	
EVAP. VOLUME (gal)	1,206,940	29,462	21,045	25,253	29,462	114,021	490,406	1,209,669	1,786,019	2,126,832	1,822,053	172,565	7,927,802
MONTHLY AVAIL. SNOWMELT (IN) _{est}	0	0	0	0	0	0	6	18	9	0	0	0	33
ESTIMATED SNOW CONTR. (%) _{est}	0%	0%	0%	0%	0%	0%	100%	41%	41%	25%	0%	0%	
ESTIMATED AREA OF INFLUENCE (ac)	50	50	50	50	50	50	50	50	50	50	50	50	23,062,559
ESTIMATED INFLUX TO STORAGE (gal) _{est}	0	0	0	0	0	0	8,146,286	9,906,307	5,009,966	0	0	0	(6,409,417)
RESERVOIR DISPOSAL GAIN (gal)	(745,473)	(1,990,193)	(3,442,108)	(4,854,983)	(3,906,212)	(3,506,600)	(9,649,954)	(9,641,200)	(3,538,801)	2,074,357	27,725,570	5,066,379	
IRRIGATION													
DISPOSAL	0	0	0	0	0	0	0	0	0	9,015,000	23,748,000	25,422,000	58,185,000
STORAGE													
BEGINNING STORAGE (gal)	0	1,815,812	5,205,238	11,511,993	20,283,458	27,754,954	35,847,386	51,335,650	67,079,935	73,691,031	64,637,797	14,388,032	
CALCULATED STORAGE GAIN (gal)	3,389,426	6,306,755	11,511,993	20,283,458	27,754,954	35,847,386	51,335,650	67,079,935	73,691,031	64,637,797	14,388,032		
ESTIMATED FINAL STORAGE (gal)	1,815,812	5,205,238	11,511,993	20,283,458	27,754,954	35,847,386	51,335,650	67,079,935	73,691,031	64,637,797	14,388,032		
AMOUNT DISCHARGED TO BLOODS CREEK (gal)	0	0	0	0	0	0	0	0	0	0	0	0	
PREDICTED FINAL STORAGE (GAL)	1,815,812	5,205,238	11,511,993	20,283,458	27,754,954	35,847,386	51,335,650	67,079,935	73,691,031	64,637,797	14,388,032		

ANNUAL OUTFLOW POTENTIAL (MG)	ANNUAL INFLOW (MG)
EVAPORATION	10.7
PERCOLATION	34.8
IRRIGATION	58.2
TOTAL	103.6

(a) Maximum estimated net percolation based on 2006 estimated disposal season percolation rate by month.
 (b) Reservoir water surface area is a function of storage volume at start of month.
 (c) Estimated snowmelt volume available for influx to storage reservoir.
 (d) Estimated percentage of snowmelt contributing to influx to reservoir.
 (e) Estimated based on fraction of accumulated snow within reservoir "area of influence" entering the reservoir during snowmelt months.
 (f) Disposal capacity based on 1-in-100 Year maximum estimated land disposal volumes.

PARAMETER / MONTH	CLIMATOLOGICAL FACTORS												
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL
PRECIPITATION (IN)	3.2	3.0	3.1	3.1	2.8	3.1	3.0	3.1	3.0	3.1	3.1	3.0	365
AVG PAN EVAP (IN)	2.9	0.89	0.61	0.76	0.83	2.14	3.89	5.34	6.64	7.63	6.87	5.17	43.62
ESTD. SNOW ACCUM (IN WATER)	2	8	17	31	37	45	46	38	12	0	0	0	46.0
ESTIMATED MAX PERCOLATION (IN) _(a)	8.6	18.1	11.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	78.5	241.4
PROJECTED INFLUENT FLOW (AVG. GAL/D)	36,413	38,021	75,704	102,039	106,243	133,082	191,592	202,799	114,600	80,899	72,837	46,072	

PARAMETER	IRRIGATION AREA CHARACTERISTICS												
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL
STORAGE RESERVOIR													
GROSS AREA (AC)	3.2	3.0	3.1	3.1	2.8	3.1	3.0	3.1	3.0	3.1	3.1	3.0	365
MAX. WATER SURFACE (AC)	2.9	0.89	0.61	0.76	0.83	2.14	3.89	5.34	6.64	7.63	6.87	5.17	43.62
STORAGE CAPACITY (MG)	0.1	8	17	31	37	45	46	38	12	0	0	0	46.0
FRAC EST. PERC.	0.1	18.1	11.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	78.5	241.4

PARAMETER	DISTRICT DISPOSAL LAND (AC)												
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL
WASTEWATER VOLUME (GAL)	1,128,791	1,140,622	2,346,835	3,163,195	2,974,814	4,126,557	5,747,452	6,286,757	3,438,008	2,507,875	2,257,934	1,382,160	36,500,000
EVAPORATION (IN)	1.9	0.5	0.4	0.5	0.5	1.3	2.2	4.3	5.3	6.1	5.5	4.1	32.6
PRECIPITATION (IN)	3.2	7.4	10.5	13.0	10.5	9.7	5.3	2.5	0.8	0.1	0.3	1.0	64.4

PARAMETER	TREATMENT PONDS CHARACTERISTICS												
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL
PERC VOLUME (GAL)	6.08	12.85	7.97	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	24.1
PERC VOLUME (GAL)	255,922	540,704	335,491	0	0	0	0	0	0	0	0	0	1,900,908
W.S. AREA (AC) _(b)	1.55	1.55	1.55	1.55	1.99	6.13	9.14	12.24	13.35	13.75	13.32	7.5	2,567,166
EVAP. VOLUME (GAL)	79,969	21,045	16,836	21,045	27,019	216,393	546,018	1,420,184	1,921,302	2,277,566	1,989,323	834,984	9,380,692
PRECIP. VOLUME (GAL)	1,689,716	3,893,694	5,508,944	6,832,331	5,508,944	5,069,149	2,781,705	1,322,387	440,796	73,466	146,932	514,261	33,794,324
MONTHLY AVAIL. SNOWMELT (IN) _(c)	0	0	0	0	0	0	0	26	12	0	0	0	46
ESTIMATED SNOW CONTR. (%) _(d)	0%	0%	0%	0%	0%	0%	100%	41%	41%	25%	0%	0%	0%
ESTIMATED AREA OF INFLUENCE (AC)	50	50	50	50	50	50	10,997,486	14,088,971	6,902,620	0	0	0	31,989,076
ESTIMATED INFLOW TO STORAGE (GAL) _(e)	0	0	0	0	0	0	(3,243,172)	(13,982,173)	(5,422,114)	2,204,100	22,003,644	16,395,304	(17,034,766)
RESERVOIR DISPOSAL (GAIN) (GAL)	(1,353,823)	(3,331,946)	(5,157,618)	(6,811,286)	(5,482,926)	(4,852,756)	(3,243,172)	(13,982,173)	(5,422,114)	2,204,100	22,003,644	16,395,304	(17,034,766)

PARAMETER	IRRIGATION DISPOSAL (GAL) _(f)												
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL
WASTEWATER VOLUME (GAL)	1,128,791	1,140,622	2,346,835	3,163,195	2,974,814	4,126,557	5,747,452	6,286,757	3,438,008	2,507,875	2,257,934	1,382,160	36,500,000
EVAPORATION (IN)	1.9	0.5	0.4	0.5	0.5	1.3	2.2	4.3	5.3	6.1	5.5	4.1	32.6
PRECIPITATION (IN)	3.2	7.4	10.5	13.0	10.5	9.7	5.3	2.5	0.8	0.1	0.3	1.0	64.4

SUMMARY

ANNUAL INFLOW (MG)	36.5
PRECIPITATION	38.3
SNOW INFLOW (MG)	32.0
TOTAL	107.8

ANNUAL OUTFLOW POTENTIAL (MG)

EVAPORATION	11.9
PERCOLATION	41.3
IRRIGATION	58.2
TOTAL	111.4

OVERALL BALANCE

UNUSED DISPOSAL CAPACITY (MG)	4
UNUSED STORAGE CAPACITY (MG)	12
(MUST NOT BE NEGATIVE)	
(MUST NOT BE NEGATIVE)	

MAXIMUM STORAGE (MG) 94
 AVAILABLE STORAGE (MG) 106

(a) Maximum estimated net percolation based on 2006 estimated disposal season percolation rate by month.
 (b) Reservoir water surface area is a function of storage volume at start of month.
 (c) Estimated snowmelt volume available for inflow to storage reservoir.
 (d) Estimated percentage of snowmelt contributing to inflow to reservoir.
 (e) Estimated based on fraction of accumulated snow within reservoir "area of influence" entering the reservoir during snowmelt months.
 (f) Disposal capacity based on 1-in-10 Year maximum estimated land disposal volumes.

PARAMETER / MONTH	STORAGE RESERVOIR												IRRIGATION AREA CHARACTERISTICS												CLIMATOLOGICAL FACTORS																										
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP
GROSS AREA (ac)	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	21.3	21.3	21.3	21.3	21.3	21.3	21.3	21.3	21.3	21.3	21.3	21.3	80	80	80	80	80	80	80	80	80	80	80	80	80	1.60	1.60	1.60	1.60	1.60	1.60	1.60	1.60	1.60	1.60	1.60	1.60	1.60
MAX. WATER SURFACE (ac)	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9	14.7	14.7	14.7	14.7	14.7	14.7	14.7	14.7	14.7	14.7	14.7	14.7	n/a	0.76	0.76	0.76	0.76	0.76	0.76	0.76	0.76	0.76	0.76	0.76	0.76	0.76												
FRACTION OF ESTIMATED PERC. RATE	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	n/a	0.80	0.80	0.80	0.80	0.80	0.80	0.80	0.80	0.80	0.80	0.80	0.80	0.80												
PROJECTED INFLUENT FLOW (Avg. GAL/D)	36,413	36,413	36,413	36,413	36,413	36,413	36,413	36,413	36,413	36,413	36,413	36,413	36,413	102,039	102,039	102,039	102,039	102,039	102,039	102,039	102,039	102,039	102,039	102,039	102,039	114,600	114,600	114,600	114,600	114,600	114,600	114,600	114,600	114,600	114,600	114,600	114,600	114,600	72,837	72,837	72,837	72,837	72,837	72,837	72,837	72,837	72,837	72,837	72,837	72,837	72,837

PARAMETER	ANNUAL OUTFLOW POTENTIAL (MG)												ANNUAL
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	
WASTEWATER VOLUME (gal)	1,128,791	1,140,822	2,346,835	3,163,195	2,974,814	4,125,557	5,747,452	6,286,757	3,438,008	2,507,875	2,257,934	1,382,160	36,500,000
EVAPORATION (IN)	1.9	0.5	0.4	0.5	0.5	1.3	2.2	4.3	5.3	6.1	5.5	4.1	32.6
PRECIPITATION (IN)	3.7	8.5	12.0	14.9	12.0	11.0	6.1	2.9	1.0	0.2	0.3	1.1	73.6
TREATMENT PONDS	0.9	1.8	1.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	7.9	12.5	24.1
PERCOLATION (IN)	67,440	142,484	88,407	39,374	39,374	102,372	173,244	338,614	417,361	480,359	433,111	322,864	1,900,908
EVAP. VOLUME (gal)	149,620	39,374	31,499	1,280,857	1,032,949	950,313	523,361	247,908	82,636	13,773	27,545	96,409	2,567,166
PRECIP. VOLUME (gal)	316,771	729,951	1,032,949	1,241,483	993,575	847,941	350,117	90,706	334,725	466,537	1,023,600	1,210,799	6,335,421
TREATMENT DISPOSAL (GAIN) (gal)	(99,711)	(548,032)	(913,043)	(1,241,483)	(993,575)	(847,941)	(350,117)	90,706	334,725	466,537	1,023,600	1,210,799	(1,867,346)
STORAGE RESERVOIR	5.35	11.31	7.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	49.07	76.13	150.87
PERCOLATION (IN)	225,283	475,972	295,326	1,55	3.52	10.22	13.37	12.74	13.84	13.84	17,827,526	18,350,357	37,174,465
W.S. AREA (ac)	1.55	1.55	1.55	1.55	1.55	1.55	1.55	1.55	1.55	1.55	1.55	1.55	1.55
EVAP. VOLUME (gal)	79,969	21,045	16,836	21,045	47,792	265,460	610,537	1,487,566	1,924,180	2,292,473	1,988,284	963,027	9,728,213
PRECIP. VOLUME (gal)	1,931,104	4,449,936	6,297,079	7,808,378	6,297,079	5,793,313	3,180,520	1,511,299	503,766	83,861	167,922	587,727	38,822,084
MONTHLY AVAIL. SNOWMELT (IN)	0	0	0	0	0	0	0	29	14	0	0	0	53
ESTIMATED SNOW CONTR. (%)	0%	0%	0%	0%	0%	0%	100%	41%	41%	25%	0%	0%	0%
ESTIMATED AREA OF INFLUENCE (ac)	50	50	50	50	50	50	50	50	50	50	50	50	50
ESTIMATED INFLOW TO STORAGE (gal)	0	0	0	0	0	0	12,645,530	16,197,732	7,985,766	0	0	0	36,777,029
RESERVOIR DISPOSAL (GAIN) (gal)	(1,625,851)	(3,952,919)	(5,984,917)	(7,787,333)	(6,249,287)	(5,527,852)	(15,223,513)	(16,221,466)	(6,515,353)	2,208,512	19,657,888	18,725,657	(28,496,435)
IRRIGATION DISPOSAL (gal)	0	0	0	0	0	0	0	0	0	0	0	0	58,185,000
STORAGE	0	0	0	0	0	0	0	0	0	0	0	0	0
BEGINNING STORAGE (gal)	0	2,854,354	8,495,987	17,740,782	29,932,794	40,150,471	50,651,821	71,972,903	85,690,418	85,309,054	86,126,830	43,955,076	0
CALCULATED STORAGE GAIN (gal)	2,854,354	5,641,634	9,244,795	12,192,012	10,217,677	10,501,350	21,321,082	22,417,515	9,618,636	-9,182,224	-42,171,754	-43,976,295	0
ESTIMATED FINAL STORAGE (gal)	2,854,354	8,495,987	17,740,782	29,932,794	40,150,471	50,651,821	71,972,903	94,390,418	95,309,054	86,126,830	43,955,076	0	0
AMOUNT DISCHARGED TO BLOODS CREEK (gal)	0	0	0	0	0	0	0	8,700,000	0	0	0	0	6,700,000
PREDICTED FINAL STORAGE (GAL)	2,854,354	8,495,987	17,740,782	29,932,794	40,150,471	50,651,821	71,972,903	85,690,418	95,309,054	86,126,830	43,955,076	0	0

SUMMARY	ANNUAL OUTFLOW POTENTIAL (MG)												ANNUAL
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	
ANNUAL INFLOW (MG)	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5
WASTEWATER	45.0	45.0	45.0	45.0	45.0	45.0	45.0	45.0	45.0	45.0	45.0	45.0	45.0
PRECIPITATION	38.8	38.8	38.8	38.8	38.8	38.8	38.8	38.8	38.8	38.8	38.8	38.8	38.8
SNOW INFLOW (MG)	118.2	118.2	118.2	118.2	118.2	118.2	118.2	118.2	118.2	118.2	118.2	118.2	118.2
TOTAL	192.5	192.5	192.5	192.5	192.5	192.5	192.5	192.5	192.5	192.5	192.5	192.5	192.5
OVERALL BALANCE	0	0	0	0	0	0	0	0	0	0	0	0	0
UNUSED DISPOSAL CAPACITY (MG)	0	0	0	0	0	0	0	0	0	0	0	0	0
(MUST NOT BE NEGATIVE)	0	0	0	0	0	0	0	0	0	0	0	0	0
UNUSED STORAGE CAPACITY (MG)	11	11	11	11	11	11	11	11	11	11	11	11	11
(MUST NOT BE NEGATIVE)	11	11	11	11	11	11	11	11	11	11	11	11	11

(a) Maximum estimated net percolation based on 2006 estimated disposal season percolation rate by month.
 (b) Reservoir water surface area is a function of storage volume at start of month.
 (c) Estimated snowmelt volume available for inflow to storage reservoir.
 (d) Estimated percentage of snowmelt contributing to inflow to reservoir.
 (e) Estimated based on fraction of accumulated snow within reservoir "area of influence" entering the reservoir during snowmelt months.
 (f) Disposal capacity based on 1-in-100 Year maximum estimated land disposal volumes.

PARAMETER / MONTH	STORAGE RESERVOIR												IRRIGATION AREA CHARACTERISTICS				CLIMATOLOGICAL FACTORS							
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL	DISTRICT DISPOSAL LAND (AC)	SOIL WATER DEFICIT BEFORE IRRIGATION (IN)	FRACT OF LAND IRRIGATED	IRRIGATION EFFICIENCY (DECIMAL FRACT)	FRACTION OF EST. PERC RATE	PRECIP/AVG PRECIP RATIO	OCT-APR EVAP/AVG EVAP RATIO	MAY-SEP EVAP/AVG EVAP RATIO	PAN COEFFICIENT	LAND PRECIP COLLECTED (FRAC)	
GROSS AREA (ac)	3.2			21.3									80	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	1.70	
MAX. WATER SURFACE (ac)	2.9			14.7									n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.76	
FRACTION OF ESTIMATED PERC RATE	0.1			106									n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.80	
STORAGE CAPACITY (MG)				0.6									n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.9	
FRAC EST. PERC													n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		
PARAMETER / MONTH	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL											
DAYS IN MONTH	31	30	31	31	28	31	30	31	30	31	31	30	365											
AVG PAN EVAP (IN)	3.05	0.89	0.61	0.76	2.14	3.69	5.34	6.64	6.64	7.63	6.67	5.17	43.62											
AVG PRECIP (IN)	2.3	5.3	7.5	9.3	7.5	6.9	3.8	1.8	0.6	0.1	0.2	0.7	46.0											
ESTD. SNOW ACCUM (IN WATER)	3	20	44	38	44	55	56	46	15	0	0	0	0											
ESTIMATED MAX PERCOLATION (IN) _(a)	8.6	18.1	11.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	78.5	125.0											
PROJECTED INFLUENT FLOW (Avg. GAL/D)	36,413	38,021	75,704	102,039	106,243	133,082	191,582	202,799	114,600	80,899	72,837	46,072												

PARAMETER	CALCULATIONS												ANNUAL
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	
WASTEWATER VOLUME (gal)	1,128,791	1,140,822	2,346,835	3,163,195	2,974,814	4,125,557	5,747,452	6,286,757	3,438,008	2,507,875	2,257,834	1,382,160	36,500,000
EVAPORATION (IN)	1.9	0.5	0.4	0.5	0.5	1.3	2.2	4.3	5.3	6.1	5.5	4.1	32.6
PRECIPITATION (IN)	3.9	5.0	12.8	15.8	12.8	11.7	6.5	3.1	1.0	0.2	0.3	1.2	78.2
TREATMENT PONDS													
PERCOLATION (IN)	0.9	1.8	1.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	7.9	12.5
PERC VOLUME (gal)	67,440	142,484	88,407	0	0	0	0	0	0	0	0	618,234	984,343
EVAP. VOLUME (gal)	149,620	39,374	31,499	39,374	39,374	102,372	173,244	338,614	417,361	480,359	433,111	322,864	2,567,166
PRECIP. VOLUME (gal)	336,569	775,573	1,097,508	1,360,910	1,097,508	1,009,708	556,071	263,402	87,801	14,633	29,267	102,434	6,731,385
TREATMENT DISPOSAL(GAIN) (gal)	(119,509)	(593,714)	(977,602)	(1,321,537)	(1,058,135)	(907,336)	(382,827)	75,212	329,561	465,726	1,022,078	1,204,773	(2,263,310)
STORAGE RESERVOIR													
PERCOLATION (IN)	5.05	10.68	6.62	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	46.32	142.42
PERC VOLUME (gal)	212,668	446,317	278,788	0	0	0	0	0	0	0	0	16,615,361	33,016,426
W.S. AREA (ac) _(b)	1.55	1.55	1.55	1.55	4.23	10.67	10.67	12.92	13.17	13.59	13.21	7.72	7.72
EVAP. VOLUME (gal)	79,969	21,045	16,836	21,045	57,431	286,994	637,420	1,508,594	1,895,396	2,251,063	1,972,895	859,487	9,608,164
PRECIP. VOLUME (gal)	2,051,798	4,728,057	6,690,646	8,295,401	6,155,395	3,389,927	3,389,927	1,695,755	535,252	89,209	178,417	624,480	41,835,964
MONTHLY AVAIL. SNOWMELT (IN) _(a)	0	0	0	0	0	0	10	31	15	0	0	0	56
ESTIMATED SNOW CONTR. (%) _(b)	0%	0%	0%	0%	0%	0%	100%	41%	41%	25%	0%	0%	0%
ESTIMATED AREA OF INFLUENCE (ac)	50	50	50	50	50	50	50	50	50	50	50	50	50
ESTIMATED INFLOW TO STORAGE (gal) _(c)	0	0	0	0	0	0	13,359,202	17,114,585	8,384,961	0	0	0	38,658,747
RESERVOIR DISPOSAL(GAIN) (gal)	(1,759,161)	(4,257,695)	(6,395,023)	(8,275,357)	(6,633,215)	(5,868,401)	(16,111,710)	(17,211,756)	(7,024,816)	2,161,855	18,409,838	15,695,320	(37,270,121)
IRRIGATION													
IRRIGATION DISPOSAL (gal) _(d)	0	0	0	0	0	0	0	0	0	9,015,000	23,748,000	25,422,000	58,185,000
STORAGE													
BEGINNING STORAGE (gal)	0	3,007,462	8,999,493	18,718,953	31,479,042	42,145,206	53,046,499	75,288,487	80,711,788	90,845,052	81,710,347	40,788,364	
CALCULATED STORAGE GAIN (gal)	3,007,462	5,992,031	9,719,460	12,760,089	10,866,164	10,907,294	22,241,988	23,423,301	101,933,264	-9,134,706	-40,921,983	-40,939,933	
ESTIMATED FINAL STORAGE (gal)	3,007,462	8,999,493	18,718,953	31,479,042	42,145,206	53,046,499	75,288,487	98,711,788	90,845,052	81,710,347	40,788,364	0	
AMOUNT DISCHARGED TO BLOODS CREEK (gal)	0	0	0	0	0	0	0	18,000,000	0	0	0	0	18,000,000
PREDICTED FINAL STORAGE (GAL)	3,007,462	8,999,493	18,718,953	31,479,042	42,145,206	53,046,499	75,288,487	80,711,788	90,845,052	81,710,347	40,788,364	0	

SUMMARY	ANNUAL OUTFLOW POTENTIAL (MG)												ANNUAL
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	
ANNUAL INFLOW (MG)	36.5												91
WASTEWATER	47.8												106
PRECIPITATION	38.9												0
SNOW INFLOW (MG)	123.1												15
TOTAL													
OVERALL BALANCE													
UNUSED DISPOSAL CAPACITY (MG)													0
(MUST NOT BE NEGATIVE)													
UNUSED STORAGE CAPACITY (MG)													15
(MUST NOT BE NEGATIVE)													

(a) Maximum estimated net percolation based on 2006 estimated disposal season percolation rate by month.
 (b) Reservoir water surface area is a function of storage volume at start of month.
 (c) Estimated snowmelt volume available for inflow to storage reservoir.
 (d) Estimated percentage of snowmelt contributing to inflow to reservoir.
 (e) Estimated based on fraction of accumulated snow within reservoir "area of influence" entering the reservoir during snowmelt months.
 (f) Disposal capacity based on 1-in-100 Year maximum estimated land disposal volumes.

B-4

**Bear Valley Water District
Memorandum
Recreation Survey
21 April 2011**

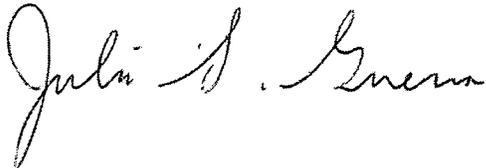
From: General Manager
To: Loren Harlow, Special Counsel, Stoel-Rives
Subject: Recreation Survey
CC: Directors
Gary Ghio, District Engineer

Loren,

Per your request I have researched the matter of potential recreation downstream of our facilities on Bloods Creek.

To answer your questions, there is no general public access through the private property that Bloods Creek flows through directly downstream of the discharge point. The meadows referred to in the draft permit are on the private property adjacent to our facilities and public access is prohibited. Then there is National Forest Land that begins approximately 1 mile downstream of our facilities. There is public access and camping in the vicinity of where the Spicer Road is traversed by the creek, about 2.4 miles downstream, for about a 0.8 mile reach to the Bloods Creek confluence with the North Fork of the Stanislaus. The Wolfeboro Boy Scout Camp is downstream from this point another 0.8 miles.

The overriding considerations in this regard are that, during our discharge season, which will of necessity occur following very heavy winters, with streams at maximum dilution, and snow still melting, there will be no camping, and, access on Spicer Road is restricted to Snow Park permit holders until 1 June in any case.



Julio S. Guerra
General Manager

B-5



Howard Backer, MD, MPH
Interim Director

State of California—Health and Human Services Agency
California Department of Public Health



EDMUND G. BROWN JR.
Governor

March 1, 2011

Diana C. Messina, Supervising Engineer
Point Source Permitting Section
Central Valley Water Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

Dear Ms. Messina:

RE: Bear Valley Water District NPDES Permit

This letter is in response to your memorandum to me, dated February 23, 2011, which provides additional information regarding the estimated frequency of discharge and the projected water quality of the discharge. Based on the information in your memorandum, our office will forgo our tertiary treatment recommendation provided that the following permit requirements are included, some of which are outlined in your memorandum:

1. Allow discharge only as a last resort
2. Shorten the allowed discharge season
3. Require the District to conduct an infiltration/inflow study
4. Require the District to evaluate alternatives to increase land disposal capacity
5. Require water quality sampling of the storage reservoir during the discharge season
6. Require the District to notify our office whenever a discharge is planned

If you have any questions regarding this matter, please contact me at (559) 447-3132.

Sincerely,

Carl L. Carlucci, P.E.
Supervising Sanitary Engineer
Central California Section
SOUTHERN CALIFORNIA BRANCH
DRINKING WATER FIELD OPERATIONS

cc: Cindy Forbes – Chief, Southern California Drinking Water Field Operations Branch
Carl Lischeske – Chief, Northern California Drinking Water Field Operations Branch
Stefan Cajina – Supervising Sanitary Engineer, North Coastal Section, DWFOB
Betty Graham – Senior Sanitary Engineer, San Francisco District, DWFOB

B-6

The costs discussed above, the additional capital expenses that are going to be incurred, and the total capital cost for this project are summarized in Table 5-3.

**Table 5-3
Opinion of Probable Capital Cost**

Capital Expense	Capital Expenditure
Total Construction Cost (Elements 1 and 2)	\$8,387,500
Design Engineering Allowance (at 10%)	\$839,000
Engineering Services During Construction (at 4%)	\$336,000
Construction Management, Inspection, and System Startup (at 8%)	\$671,000
Incurring Capital Costs plus administration/legal (at 1%)	\$359,000
Total Capital Cost	\$10,592,500

5.5 IMPLEMENTATION SCHEDULE

Table 5-4 and Appendix 5-C represent the proposed revised implementation schedule. This revised implementation schedule includes completion of the I-Bank Loan Application and notice regarding the proposed rate increase to occur during the July 2007 Board Meeting. This revised schedule also presents the first phase of construction proposed for the fall of 2007 to include earthwork and preparation of a building pad for the Tertiary Treatment Building.

B-7

BEAR VALLEY WATER DISTRICT

MEMORANDUM



TO JULIO GUERRA, DISTRICT MANAGER

FROM GARY S. GHIO, DISTRICT ENGINEER

RE ECONOMIC IMPACTS OF TERTIARY WASTEWATER TREATMENT PLANT

DATE June 20, 2011

Julio, as requested I have examined the economic cost of construction of a tertiary wastewater treatment plant in terms of cost per residential living unit (RLU) should the Regional Water Quality Control Board impose the requirement of the tertiary plant on the District as part of the current NPDES renewal process. Attached to this memorandum is a summary of the various financing options available to the District, as well as a cost per RLU for existing customers based upon the type of financing which would be pursued.

To summarize the attached calculations:

- A. The Phase I Tertiary Facilities Pre-Design Report prepared by Eco:Logic estimated the construction cost to be \$10,592,500 in June 2007. Adjusting this estimated construction cost to June 2011 utilizing the ENR San Francisco Construction Cost Index yields a present day estimated construction cost of \$11,882,616.
- B. Various financing options available to the District which are analyzed as part of this analysis are a USDA loan, a Clean Water State Revolving Fund Loan, as well as the formation of an Assessment District. (The interest rate and time period for the assessment district are based upon previous work done by Eco:Logic.)
- C. The estimated monthly cost per RLU for each of these financing options is as follows:

USDA Loan	\$ 80.17 per RLU/month
CWSRF Loan	\$ 94.50 per RLU/month
Assessment District	\$106.92 per RLU/month

As you are fully aware, the customers within the Bear Valley Water District have equivalent RLUs ranging from 3 up to 9.9 depending on the number of bedrooms and bathrooms within a particular residence. Utilizing this range of RLUs results in a cost increase utilizing the USDA financing of between \$240.51 per month and \$793.68 per month per residence depending on the number of RLUs associated with said residence.

Utilizing the same process for an assessment district yields cost increases per residence of between \$320.76 per month and \$1,058.51 per month, again depending upon the number of RLUs associated with the residence.

It should be noted that both the USDA and assessment district financing would result in a total approximate cost including interest of \$25,650,000 as compared to \$15,111,840 for the Clean Water State Revolving Fund Loan due to a lower interest rate and shorter loan repayment period. Should the CWSRF loan be the preferred method of financing, as it minimizes interest charges, the cost increases per residence would range from \$283.50 per month up to \$935.55 per month depending upon the size of the residence.

As can be seen by this analysis, the required increases in current customer rates to pay for a tertiary treatment plant would be unsustainable due to the high levels of funding required. (Especially in light of the fact that the tertiary plant would only be used once in a 25 year period based upon the current District water balances.)

Should you require any additional information, please contact me at your convenience.

#2322/nlm
DistMgr_Memo-6-20-11

**BEAR VALLEY WATER DISTRICT
TERTIARY WASTEWATER TREATMENT PLANT
DETERMINATION OF COST PER RESIDENTIAL LIVING UNIT**

A.) Per June 2007 Eco:Logic Phase I Tertiary Facilities Pre-Design Report: Construction Cost = \$10,592,500

B.) Utilizing ENR San Francisco June 2007 CCI (9063.41) and June 2011 CCI (10167.29):

Present Day Cost = $(\$10,592,500)(10167.29/9063.41) = \$11,882,616$

C.) Financing Options:

USDA Loan : 4.5% for 40 years

CWSRF Loan: 2.5 % for 20 years

Assessment District: 6% for 30 years

D.) Cost per RLU:

USDA Loan: $(\$53,420/\text{mth})/(666.3 \text{ RLU}) = \$80.17/\text{RLU}/\text{month}$

Total Cost = \$25,641,600

CWSRF Loan: $(\$62,966/\text{mth})/(666.3 \text{ RLU}) = \$94.50/\text{RLU}/\text{month}$

Total Cost = \$15,111,840

Assessment District: $(\$71,242/\text{mth})/(666.3 \text{ RLU}) = \$106.92/\text{RLU}/\text{month}$

Total Cost = \$25,647,120

E.) Monthly Cost Increase per Current District Customers RLU basis:

<u>No. of RLU</u>	<u>Cost Range:</u>		
	<u>USDA</u>	<u>CWSRF</u>	<u>Assess. Dist.</u>
3	\$ 240.51	\$ 283.50	\$ 320.76
4	\$ 320.68	\$ 378.00	\$ 427.68
5	\$ 400.85	\$ 472.50	\$ 534.60
6	\$ 481.02	\$ 567.00	\$ 641.52
7	\$ 561.10	\$ 661.50	\$ 748.44
9	\$ 721.53	\$ 850.50	\$ 962.28
9.9	\$ 793.68	\$ 935.55	\$ 1,058.51

B-8



**BEAR VALLEY
WATER DISTRICT**
P.O. Box 5027
Bear Valley, CA 95223
(209) 753-2112

BOARD OF DIRECTORS:
JIM D. BISSELL
PHILL A. COFFMAN
JOHN R. DRALLA
BARBARA J. GOODRICH
JERRY J. NELSON

February 1, 2011

Jim Marshall
Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

RE Bear Valley Water District
NPDES Application

Jim, as discussed during our telephone conversation last week, the District's current Waste Discharge Requirements No. 05-10-2008 impose a maximum annual average Wastewater Treatment Plant (WWTP) influent flow of 100,000 GPD (36.5 MG/YR). Based upon this limitation I have revised the District's water balance projections to provide some guidance on the likelihood of required Bloods Creek discharge under the various precipitation water year assumptions. To this end, please find the following attached items:

1. Summary of Wastewater Treatment Plant Influent Flows 2001 through 2010.
2. Water Year 2010 Average Year Precipitation Water Balance Projection.
3. Water Year 2010 1-in-5 Year Precipitation Water Balance Projection.
4. Water Year 2010 1-in-10 Year Precipitation Water Balance Projection.
5. Water Year 2010 1-in-25 Year Precipitation Water Balance Projection.
6. Water Year 2010 1-in-50 Year Precipitation Water Balance Projection.
7. Water Year 2010 1-in-100 Year Precipitation Water Balance Projection.

The attached Water Balance Projections were developed by the District's previous Engineer, ECO:LOGIC, in support of the District's original NPDES permit. The assumptions on precipitation levels, percolation, evaporation, spray disposal levels, etc. contained in the Projections are consistent with the previous Projections approved by the Regional Board as part of the NPDES permit application process.

In order to determine a monthly distribution of the 100,000 GPD average daily influent flows, actual WWTP influent flows for 2001 through 2010 were analyzed to determine the average monthly percentage of the annual flow. These percentages were then utilized to develop the distribution of anticipated influent flows based upon the 100,000 GPD yearly average limit. This information is contained in Item 1 attached. In addition it should be noted the 10 year average yearly flow from 2001

to 2010 was approximately 26.4 MG per year with a peak of approximately 31.9 MG in 2005 which was an approximate 1-in-10 year precipitation event for both total rainfall and snow water content. It should also be noted the year 2006 was a 1-in-100 year total precipitation event although the snow water content was a 1-in-5 year precipitation event. The following is a summary of predicted required discharges to Bloods Creek based upon each water year precipitation assumption:

Water Year Precipitation	Discharge to Bloods Creek (MG)
Average Year	0
1-in-5 Year	0
1-in-10 Year	0
1-in-25 Year	9
1-in-50 Year	18
1-in-100 Year	54

As is evident from the above summary, the District does not anticipate discharges to Bloods Creek with the current WDR limitation of 100,000 GPD yearly average WWTP influent flow until the water precipitation year approaches or exceeds the 1-in-25 year precipitation level. This has also been verified during the past ten years during which time no discharges were required to Bloods Creek.

Due to the unique environmental setting of the Bear Valley Water District's facilities, the majority of treated effluent in the District's polishing pond consists of water from precipitation or snow influx directly in the treatment/polishing ponds. Based upon the 1-in-25 year, 1-in-50 year, and 1-in 100 year Projections, the amount of actual wastewater contained in any potential discharge is projected to be approximately 30%. Combining this already diluted wastewater with the proposed NPDES requirement of 20:1 dilution for any discharge to Bloods Creek would result in actual dilution levels of approximately 69:1 for any potential discharge.

Due to the current state of the economy, significant growth within the Bear Valley Water District is not anticipated during the next five years. As is evident from the summary of flows from 2001 through 2010, the District's current WWTP influent flows are considerably less than the permitted maximum per the District's WDRs. Any anticipated growth during this time period would not result in the District exceeding its WDR limitations.

As is evident from the accompanying analysis, discharge to Bloods Creek is not anticipated except in events exceeding the 1-in-25 year precipitation year and at dilution levels that far exceed the proposed NPDES requirement of 20:1. For the Department of Public Health to recommend a requirement that the District construct a tertiary treatment plant in order to discharge to Bloods Creek is extremely unreasonable given the anticipated need for this discharge being only in water year events of greater than in 1-in-25 years and projected high dilution levels. The imposition of this requirement would place an undue financial burden on the rate payers of the District without any significant benefit to the District users or any potential downstream water users due to the anticipated, infrequent use of the Bloods Creek discharge itself.

Should you require any additional information, please contact me at your convenience.



Gary S. Ghio, District Engineer

Attachments

Cc Julio Guerra, District Manager
BVWD Board of Directors

#2322/nlm

Marshall_Letter_2-1-11



**BEAR VALLEY WATER DISTRICT
WWTP INFLUENT FLOWS 2001 THRU 2010
1/26/2011**

	2010	2009	2008	2007	2006	2005	2004	2003	2002	2001	AVG. DAILY FLOW (GAL/DAY)	MONTHLY PERCENTAGE OF ANNUAL FLOW	100,000 GPD YEAR AVG. MONTHLY FLOW	100,000 GPD YEAR AVG. DAILY FLOW
	(MG)	(GAL/DAY)		(GAL/MONTH)	(GAL/DAY)									
DEC	2.395	1.166	1.144	1.088	1.300	2.404	2.658	1.375	1.629	1.831	1.699	6.43%	2346835	75704
NOV	0.875	0.480	0.650	0.522	0.860	0.909	1.073	0.858	1.179	0.852	0.826	3.12%	1140622	38021
OCT	0.923	0.677	0.565	0.700	0.833	0.832	0.870	0.953	0.984	0.834	0.817	3.09%	1128791	36413
SEPT	0.864	0.815	0.766	1.228	0.814	1.035	1.003	1.178	1.269	1.035	1.001	3.79%	1382160	46072
AUG	1.554	1.379	1.500	1.517	1.085	1.708	1.618	1.938	1.941	2.108	1.635	6.19%	2257934	72837
JULY	2.365	1.618	1.472	1.593	1.143	2.283	1.568	2.125	1.989	2.001	1.816	6.87%	2507875	80899
JUNE	4.845	1.963	2.071	1.792	2.079	3.900	1.755	2.460	2.280	1.746	2.489	9.42%	3438008	114600
MAY	5.584	4.597	4.391	3.328	5.078	6.945	2.958	4.280	4.539	3.816	4.551	17.22%	6286757	202799
APRIL	3.599	4.461	4.815	3.837	3.551	4.015	4.420	3.250	5.549	4.113	4.161	15.75%	5747452	191582
MARCH	1.806	3.105	1.972	3.214	3.071	3.275	3.975	3.597	3.109	2.744	2.987	11.30%	4125557	133082
FEB	1.369	1.732	1.321	1.528	3.551	2.448	1.842	3.120	2.862	1.765	2.154	8.15%	2974814	106243
JAN	1.368	1.594	4.815	1.315	3.086	2.135	1.752	2.658	2.366	1.812	2.290	8.67%	3163195	102039
TOTAL:	27.546	23.587	25.483	21.662	26.450	31.887	25.492	27.792	29.696	24.657	26.425	100.00%	36500000	

10 YEAR AVERAGE YEARLY FLOW: 26.425 MG

INPUT DATA		CLIMATOLOGICAL FACTORS											
TREATMENT POND CHARACTERISTICS		PRECIPITATION (IN)											
GROSS AREA (ac)	3.2	OCT-APR EVAP/AVG EVAP RATIO.....											
WATER SURFACE AREA (ac)	2.9	MAY-SEP EVAP/AVG EVAP RATIO.....											
STORAGE RESERVOIR		PAN COEFFICIENT.....											
GROSS AREA (ac)	21.3	LAND PRECIP COLLECTED (FRAC).....											
MAX. WATER SURFACE (ac)	14.7	ANNUAL											
IRRIGATION AREA CHARACTERISTICS		ANNUAL											
DISTRICT DISPOSAL LAND (AC)	80	ANNUAL											
SOIL WATER DEFICIT BEFORE IRRIGATION (IN)	n/a	ANNUAL											
FRACT OF LAND IRRIGATED	n/a	ANNUAL											
IRRIGATION EFFICIENCY (DECIMAL FRACT)	n/a	ANNUAL											
FRACTION OF EST. PERC RATE	0.8	ANNUAL											

PARAMETER / MONTH	IRRIGATION AREA CHARACTERISTICS											
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP
DAYS IN MONTH	31	30	31	31	28	31	30	31	30	31	31	30
AVG PAN EVAP (IN)	3.05	0.89	0.61	0.76	0.83	2.14	3.69	5.34	6.64	7.63	6.87	5.17
AVG PRECIP (IN)	2.3	5.3	7.5	9.3	7.5	6.9	3.8	1.8	0.6	0.1	0.2	0.7
ESTD. SNOW ACCUM (IN Water)	2	7	14	27	32	39	40	33	11	0	0	0
ESTIMATED MAX PERCOLATION (IN) _(a)	8.6	18.1	11.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	78.5	125.0
PROJECTED INFLUENT FLOW (Avg. GAL/D)	36,413	38,021	75,704	102,039	108,243	133,082	191,582	202,759	114,600	80,899	72,837	46,072

PARAMETER / MONTH	CALCULATIONS											
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP
WASTEWATER VOLUME (gal)	1,128,791	1,140,822	2,346,835	3,163,195	2,974,814	4,125,557	5,747,452	6,286,757	3,438,008	2,507,875	2,257,934	1,382,160
EVAPORATION (IN)	2.4	0.7	0.5	0.6	0.7	1.7	3.0	4.3	5.3	6.1	5.5	4.1
PRECIPITATION (IN)	2.8	6.4	9.0	11.2	9.0	8.3	4.6	2.2	0.7	0.1	0.2	0.8
TREATMENT PONDS												
PERCOLATION (IN)	0.9	1.8	1.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	7.9	12.5
PERC VOLUME (gal)	67,440	142,484	88,407	0	0	0	0	0	0	0	618,234	864,343
EVAP. VOLUME (gal)	188,994	55,123	39,374	47,248	55,123	133,871	286,242	338,614	417,361	480,359	433,111	322,864
PRECIP. VOLUME (gal)	237,578	547,463	774,712	960,643	714,712	712,735	392,521	185,931	61,977	10,329	20,659	72,306
TREATMENT DISPOSAL GAIN _(a) (gal)	18,855	(349,855)	(646,931)	(913,394)	(719,599)	(578,864)	(156,278)	152,683	355,384	470,030	1,030,686	1,234,901
STORAGE RESERVOIR												
PERCOLATION (IN)	7.11	15.02	9.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	65.16	103.75
PERC VOLUME (gal)	289,176	632,091	392,193	0	0	0	0	0	0	0	22,807,935	6,536,037
W.S. AREA (ac) _(a)	1.55	1.55	1.55	1.55	1.55	4.42	7.72	11.44	12.89	12.89	12.89	2.32
EVAP. VOLUME (gal)	101,014	29,462	21,045	25,253	29,462	204,037	628,893	1,335,774	1,865,174	2,201,371	1,925,103	258,292
PRECIP. VOLUME (gal)	1,448,328	3,337,452	4,722,809	5,856,283	4,722,809	4,344,984	2,392,890	1,133,474	377,825	62,971	125,942	440,796
MONTHLY AVAIL. SNOWMELT (IN) _(a)	0	0	0	0	0	0	7	22	11	0	0	0
ESTIMATED SNOW CONTR. (%) _(a)	0%	0%	0%	0%	0%	0%	100%	41%	41%	25%	0%	0%
ESTIMATED AREA OF INFLUENCE (ac)	50	50	50	50	50	50	50	50	50	50	50	50
ESTIMATED INFLOW TO STORAGE (gal) _(a)	0	0	0	0	0	0	9,504,000	12,107,709	6,123,291	0	0	0
RESERVOIR DISPOSAL GAIN _(a) (gal)	(1,048,138)	(2,675,899)	(4,309,571)	(5,831,030)	(4,693,347)	(4,140,947)	(11,267,997)	(11,905,410)	(4,655,943)	2,138,400	24,607,096	6,353,333
IRRIGATION												
IRRIGATION DISPOSAL (gal) _(a)	0	0	0	0	0	0	0	0	0	0	0	0
STORAGE												
BEGINNING STORAGE (gal)	0	2,158,074	6,324,450	13,627,787	23,535,406	31,923,156	40,769,524	57,940,251	75,979,734	83,698,301	74,582,746	27,454,897
CALCULATED STORAGE GAIN (gal)	2,158,074	4,166,376	7,303,337	9,907,620	8,397,750	8,846,368	17,171,727	18,039,483	7,718,567	-9,115,555	-47,127,848	-31,628,273
ESTIMATED FINAL STORAGE (gal)	2,158,074	6,324,450	13,627,787	23,535,406	31,923,156	40,769,524	57,940,251	75,979,734	83,698,301	74,582,746	27,454,897	0
AMOUNT DISCHARGED TO BLOODS CREEK (gal)	0	0	0	0	0	0	0	0	0	0	0	0
PREDICTED FINAL STORAGE (GAL)	2,158,074	6,324,450	13,627,787	23,535,406	31,923,156	40,769,524	57,940,251	75,979,734	83,698,301	74,582,746	27,454,897	0

SUMMARY	ANNUAL OUTFLOW POTENTIAL (MG)											
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP
ANNUAL INFLOW (MG)	36.5	33.7	21.2	22.2	21.2	21.2	21.2	21.2	21.2	21.2	21.2	21.2
WASTEWATER	36.5	33.7	21.2	22.2	21.2	21.2	21.2	21.2	21.2	21.2	21.2	21.2
PRECIPITATION	33.7	21.2	22.2	21.2	21.2	21.2	21.2	21.2	21.2	21.2	21.2	21.2
SNOW INFLOW (MG)	22.2	21.2	21.2	21.2	21.2	21.2	21.2	21.2	21.2	21.2	21.2	21.2
TOTAL	96.0	96.0	96.0	96.0	96.0	96.0	96.0	96.0	96.0	96.0	96.0	96.0
OVERALL BALANCE	UNUSED DISPOSAL CAPACITY (MG) (MUST NOT BE NEGATIVE)											
UNUSED DISPOSAL CAPACITY (MG)	UNUSED STORAGE CAPACITY (MG) (MUST NOT BE NEGATIVE)											
UNUSED STORAGE CAPACITY (MG)	UNUSED STORAGE CAPACITY (MG) (MUST NOT BE NEGATIVE)											
TOTAL	UNUSED STORAGE CAPACITY (MG) (MUST NOT BE NEGATIVE)											

(a) Maximum estimated net percolation based on 2006 estimated disposal season percolation rate by month.
 (b) Reservoir water surface area is a function of storage volume at start of month.
 (c) Estimated snowmelt volume available for inflow to storage reservoir.
 (d) Estimated percentage of snowmelt contributing to inflow to reservoir.
 (e) Estimated based on fraction of accumulated snow within reservoir "area of influence" entering the reservoir during snowmelt months.
 (f) Disposal capacity based on 1-in-100 Year maximum estimated land disposal volumes.

PARAMETER / MONTH	CLIMATOLOGICAL FACTORS												
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL
PRECIPITATION (IN)	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2
WATER SURFACE AREA (AC)	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2
STORAGE RESERVOIR													
GROSS AREA (AC)	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2
MAX. WATER SURFACE (AC)	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9
FRACTION OF ESTIMATED PERC RATE	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1
STORAGE CAPACITY (MG)													
FRACTION OF EST. PERC RATE	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.7
DAYS IN MONTH	31	30	31	31	28	31	30	31	30	31	31	30	365
AVG PAN EVAP (IN)	3.05	0.89	0.61	0.76	0.83	2.14	3.69	5.34	6.64	7.63	6.87	5.17	43.62
AVG PRECIP (IN)	2.3	5.3	7.5	9.3	7.5	6.9	3.8	3.8	0.6	0.2	0.2	0.7	46.0
ESTD. SNOW ACCUM (IN WATER)	2	8	17	31	37	45	46	38	12	0	0	0	241.4
ESTIMATED MAX PERCOLATION (IN ₁₀)	8.6	18.1	11.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	78.5	125.0	241.4
PROJECTED INFLUENT FLOW (AVG. GAL/D)	36,413	39,021	75,704	102,039	106,243	133,082	191,582	202,799	114,600	80,989	72,837	46,072	

PARAMETER	IRRIGATION AREA CHARACTERISTICS												
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL
WASTEWATER VOLUME (GAL)	1,128,791	1,140,622	2,346,835	3,163,195	2,974,814	4,125,557	5,747,452	6,286,757	3,438,008	2,507,875	2,257,934	1,382,160	36,500,000
EVAPORATION (IN)	1.9	0.5	0.4	0.5	0.5	1.3	2.2	4.3	5.3	6.1	5.5	4.1	32.6
PRECIPITATION (IN)	3.2	7.4	10.5	13.0	10.5	9.7	5.3	2.5	0.8	0.1	0.3	1.0	64.4
TREATMENT PONDS													
PERCOLATION (IN)	0.9	1.8	1.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	7.9	12.5	24.1
PERC VOLUME (GAL)	67,440	142,484	88,407	0	0	0	0	0	0	0	618,234	984,343	1,900,908
EVAP. VOLUME (GAL)	149,620	39,374	31,499	39,374	39,374	102,372	173,244	338,614	417,361	480,359	433,111	322,864	2,567,166
PRECIP. VOLUME (GAL)	277,175	638,707	903,830	1,120,750	457,941	831,524	2,791,705	1,322,387	72,306	12,051	24,102	84,358	5,543,483
TREATMENT DISPOSAL(GAIN)/ (GAL)	(60,115)	(456,849)	(783,924)	(1,081,376)	(864,457)	(725,152)	(284,696)	121,695	345,055	468,308	1,027,243	1,222,850	(1,075,419)
STORAGE RESERVOIR													
PERCOLATION (IN)	6.08	12.85	7.97	0.00	0.00	0.00	0.00	0.00	0.00	0.00	55.74	88.75	171.39
PERC VOLUME (GAL)	255,922	540,704	335,491	0	0	0	0	0	0	0	20,161,283	18,074,572	39,367,941
W.S. AREA (AC) ₁₀	1.55	1.55	1.55	1.55	1.99	6.13	9.14	12.24	13.35	13.75	13.32	7.5	7.5
EVAP. VOLUME (GAL)	79,959	21,045	16,836	21,045	27,019	216,393	546,018	1,429,184	1,921,302	2,277,566	1,989,323	834,984	9,380,692
PRECIP. VOLUME (GAL)	1,689,716	3,883,694	5,509,944	6,832,331	5,509,944	5,069,149	2,791,705	1,322,387	440,796	73,466	146,932	514,261	33,794,324
MONTHLY AVAIL. SNOWMELT (IN) ₁₀	0	0	0	0	0	0	0	26	12	0	0	0	46
ESTIMATED SNOW CONTR. (%) ₁₀	0%	0%	0%	0%	0%	0%	100%	41%	41%	25%	0%	0%	0%
ESTIMATED AREA OF INFLUENCE (AC)	50	50	50	50	50	50	50	50	50	50	50	50	50
ESTIMATED INFLOW TO STORAGE (GAL) ₁₀	0	0	0	0	0	0	10,997,466	14,088,971	6,902,620	0	0	0	31,980,076
RESERVOIR DISPOSAL(GAIN)/ (GAL)	(1,353,825)	(3,331,945)	(5,157,618)	(6,811,286)	(5,482,826)	(4,852,756)	(13,243,172)	(13,982,173)	(5,422,114)	2,204,100	22,003,644	18,395,304	(17,034,766)
IRRIGATION DISPOSAL (GAL) ₁₀	0	0	0	0	0	0	0	0	0	0	0	0	58,185,000
STORAGE													
BEGINNING STORAGE (GAL)	0	2,542,731	7,472,146	15,760,523	26,816,381	36,138,577	45,846,042	65,121,363	85,268,598	83,783,665	84,604,132	40,083,178	
CALCULATED STORAGE GAIN (GAL)	2,542,731	4,929,416	8,286,377	11,055,657	9,322,197	9,707,465	19,275,321	20,147,235	8,515,067	-9,178,533	-44,520,953	-43,857,994	
ESTIMATED FINAL STORAGE (GAL)	2,542,731	7,472,146	15,760,523	26,816,381	36,138,577	45,846,042	65,121,363	85,268,598	93,783,665	84,604,132	40,083,178	0	
AMOUNT DISCHARGED TO BLOODS CREEK (GAL)	0	0	0	0	0	0	0	0	0	0	0	0	0
PREDICTED FINAL STORAGE (GAL)	2,542,731	7,472,146	15,760,523	26,816,381	36,138,577	45,846,042	65,121,363	85,268,598	93,783,665	84,604,132	40,083,178	0	

PARAMETER	ANNUAL OUTFLOW POTENTIAL (MG)												
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL
WASTEWATER	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5
PRECIPITATION	38.3	38.3	38.3	38.3	38.3	38.3	38.3	38.3	38.3	38.3	38.3	38.3	38.3
SNOW INFLOW (MG)	32.0	32.0	32.0	32.0	32.0	32.0	32.0	32.0	32.0	32.0	32.0	32.0	32.0
TOTAL	107.8	107.8	107.8	107.8	107.8	107.8	107.8	107.8	107.8	107.8	107.8	107.8	107.8
OVERALL BALANCE													
UNUSED DISPOSAL CAPACITY (MG)													4
(MUST NOT BE NEGATIVE)													
UNUSED STORAGE CAPACITY (MG)													12
(MUST NOT BE NEGATIVE)													

(a) Maximum estimated net percolation based on 2006 estimated disposal season percolation rate by month.
 (b) Reservoir water surface area is a function of storage volume at start of month.
 (c) Estimated snowmelt volume available for inflow to storage reservoir.
 (d) Estimated percentage of snowmelt contributing to inflow to reservoir.
 (e) Estimated based on fraction of accumulated snow within reservoir "area of influence" entering the reservoir during snowmelt months.
 (f) Disposal capacity based on 1-in-100 Year maximum estimated land disposal volumes.

BEAR VALLEY WATER DISTRICT WASTEWATER TREATMENT AND DISPOSAL SYSTEM
 Water Year 2010 1-in-25 Year Precipitation Water Balance Projection Assuming 100,000 GPD Yearly Average WWTP Inflow Per BYWVD existing WDR #5-10-2008

PARAMETER / MONTH	CLIMATOLOGICAL FACTORS												
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL
PRECIP. VOLUME (GAL)	1,128,791	1,140,622	2,346,635	3,163,195	2,974,814	4,125,557	5,747,452	6,286,757	3,438,008	2,507,875	2,257,934	1,382,160	36,500,000
EVAPORATION (IN)	1.9	0.5	0.4	0.5	0.5	1.3	2.2	4.3	5.3	6.1	5.5	4.1	32.6
PRECIPITATION (IN)	3.7	8.5	12.0	14.9	12.0	11.0	6.1	2.9	1.0	0.2	0.3	1.1	73.6
TREATMENT PONDS													
PERCOLATION (IN)	0.9	1.8	1.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	24.1
PERC. VOLUME (GAL)	67,440	142,484	88,407	0	0	0	0	0	0	0	0	0	1,900,908
EVAP. VOLUME (GAL)	149,620	38,374	31,499	39,374	38,374	102,372	173,244	338,614	417,361	480,359	433,111	322,864	2,567,166
PRECIP. VOLUME (GAL)	316,771	729,851	1,032,949	1,280,857	1,032,949	950,313	523,361	247,908	82,636	13,773	27,545	96,409	6,335,421
TREATMENT DISPOSAL GAIN (GAL)	(99,711)	(548,092)	(913,043)	(1,241,483)	(993,575)	(847,941)	(350,117)	90,706	334,725	466,587	1,023,800	1,210,799	(1,867,346)
STORAGE RESERVOIR													
PERCOLATION (IN)	5.35	11.31	7.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	150.87
PERC. VOLUME (GAL)	225,283	475,972	295,326	0	0	0	0	0	0	0	0	0	37,174,465
W.S. AREA (AC)	1.55	1.55	1.55	1.55	3.52	7.52	13.84	12.74	13.37	13.84	13.38	8.65	8.65
EVAP. VOLUME (GAL)	79,969	21,045	16,836	21,045	47,792	265,460	610,537	1,487,566	1,924,180	2,292,473	1,988,284	963,027	9,128,213
PRECIP. VOLUME (GAL)	1,931,104	4,449,936	6,297,079	7,806,378	6,297,079	5,793,313	3,190,520	1,511,299	503,166	83,991	167,922	587,727	38,622,084
MONTHLY AVAIL. SNOWMELT (IN)	0	0	0	0	0	0	9	29	14	0	0	0	53
ESTIMATED SNOW CONTR. (IN)	0%	0%	0%	0%	0%	0%	100%	41%	41%	25%	0%	0%	0%
ESTIMATED AREA OF INFLUENCE (AC)	50	50	50	50	50	50	50	50	50	50	50	50	50
ESTIMATED INFLOW TO STORAGE (GAL)	0	0	0	0	0	0	12,643,530	16,197,732	7,935,766	0	0	0	36,777,029
RESERVOIR DISPOSAL GAIN (GAL)	(1,625,851)	(3,952,919)	(5,984,917)	(7,787,333)	(6,249,287)	(5,527,852)	(15,223,513)	(16,221,465)	(6,515,353)	2,206,512	19,657,888	18,725,657	(28,496,435)
IRRIGATION													
IRRIGATION DISPOSAL (GAL)	0	0	0	0	0	0	0	0	0	0	0	0	58,185,000
STORAGE													
BEGINNING STORAGE (GAL)	0	2,854,354	8,495,987	17,740,782	29,932,794	40,150,471	50,651,821	71,972,903	85,690,418	95,309,054	86,126,830	43,955,076	8,700,000
CALCULATED STORAGE GAIN (GAL)	2,854,354	5,641,634	9,244,795	12,192,012	10,217,677	10,901,350	21,321,082	22,417,515	9,618,636	-9,182,224	-42,171,754	-43,916,295	0
ESTIMATED FINAL STORAGE (GAL)	2,854,354	8,495,987	17,740,782	29,932,794	40,150,471	50,651,821	71,972,903	94,390,418	95,309,054	86,126,830	43,955,076	0	0
AMOUNT DISCHARGED TO BLOODS CREEK (GAL)	0	0	0	0	0	0	0	8,700,000	0	0	0	0	0
PREDICTED FINAL STORAGE (GAL)	2,854,354	8,495,987	17,740,782	29,932,794	40,150,471	50,651,821	71,972,903	85,690,418	95,309,054	86,126,830	43,955,076	0	0

ANNUAL OUTFLOW POTENTIAL (MG)

ANNUAL OUTFLOW POTENTIAL (MG)	EVAPORATION	PERCOLATION	IRRIGATION	TOTAL
ANNUAL OUTFLOW POTENTIAL (MG)	12.3	39.1	58.2	118.3

OVERALL BALANCE

UNUSED DISPOSAL CAPACITY (MG)	0
UNUSED STORAGE CAPACITY (MG)	11

(a) Maximum estimated net percolation based on 2006 estimated disposal season percolation rate by month.
 (b) Reservoir water surface area is a function of storage volume at start of month.
 (c) Estimated snowmelt volume available for inflow to storage reservoir.
 (d) Estimated percentage of snowmelt contributing to inflow to reservoir.
 (e) Estimated based on fraction of accumulated snow within reservoir "area of influence" entering the reservoir during snowmelt months.
 (f) Disposal capacity based on 1-in-100 Year maximum estimated land disposal volumes.

BEAR VALLEY WATER DISTRICT WASTEWATER TREATMENT AND DISPOSAL SYSTEM
 Water Year 2010 1-in-50 Year Precipitation Water Balance Projection Assuming 100,000 GPD Yearly Average WWTP Inflow Per BYWD existing WDR #5-10-2008

PARAMETER / MONTH	STORAGE RESERVOIR												IRRIGATION AREA CHARACTERISTICS				CLIMATOLOGICAL FACTORS										
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL	
GROSS AREA (ac)	3.2			21.3										80													1,70
WATER SURFACE AREA (ac)	2.9			14.7										n/a													0,76
FRACTION OF ESTIMATED PERC RATE	0.1			106										n/a													1,00
PRECIPITATION (IN)	3.05	0.89	0.61	0.76	2.14	3.69	6.64	5.34	7.63	6.87	5.17	43.62															46,0
ESTD. SNOW ACCUM (IN WATER)	2.3	5.3	7.5	9.3	7.5	6.9	1.8	0.1	0.2	0.2	0.7	46.0															241,4
ESTIMATED MAX PERCOLATION (IN _{net})	3	9	20	38	44	55	0	0	0	0	0	0															0
PROJECTED INFLUENT FLOW (Avg. GAL/D)	36,413	38,021	75,704	102,039	106,243	133,082	181,582	202,798	114,600	80,899	72,837	46,072															

PARAMETER / MONTH	IRRIGATION AREA CHARACTERISTICS												CLIMATOLOGICAL FACTORS														
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL	
DISTRICT DISPOSAL LAND (AC)																											
SOIL WATER DEFICIT BEFORE IRRIGATION (IN)																											
FRACT OF LAND IRRIGATED																											
IRRIGATION EFFICIENCY (DECIMAL FRACT)																											
FRACTION OF EST. PERC RATE																											
PRECIPITATION (IN)	1,128,791	2,346,835	3,163,195	2,974,814	4,125,557	5,747,452	6,286,757	3,438,008	2,507,875	2,257,934	1,382,160	36,500,000															
EVAPORATION (IN)	1.9	0.5	0.4	0.5	1.3	2.2	4.3	5.3	6.1	5.5	4.1	32.6															
PRECIPITATION (IN)	3.9	9.0	12.8	15.8	12.8	11.7	6.5	1.0	0.2	0.3	1.2	78.2															
TREATMENT PONDS																											
PERCOLATION (IN)	0.9	1.8	1.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	24.1															
PERC VOLUME (GAL)	67,440	142,484	88,407	0	0	0	0	0	0	0	0	1,900,908															
EVAP. VOLUME (GAL)	149,620	39,374	31,499	39,374	102,372	173,244	338,614	417,361	480,359	433,111	332,864	2,567,166															
PRECIP. VOLUME (GAL)	336,569	775,573	1,097,508	1,360,910	1,009,708	556,071	263,402	87,801	14,633	28,267	102,434	6,731,385															
TREATMENT DISPOSAL GAIN (GAL)	(119,509)	(593,714)	(977,602)	(1,321,537)	(1,058,135)	(807,336)	(382,827)	465,726	1,022,078	1,204,773		(2,263,310)															
STORAGE RESERVOIR																											
PERCOLATION (IN)	5.05	10.88	6.62	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	142.42															
PERC VOLUME (GAL)	212,668	448,317	278,788	0	0	0	0	0	0	0	0	33,016,426															
W.S. AREA (ac) _{net}	1.55	1.55	1.55	4.23	8.13	10.67	13.17	13.59	13.21	13.21	7.72	9,608,164															
EVAP. VOLUME (GAL)	79,969	21,045	16,836	21,045	57,431	286,994	637,420	1,508,594	1,895,396	1,972,895	859,487	9,608,164															
PRECIP. VOLUME (GAL)	2,051,798	4,728,057	6,690,646	8,296,401	6,690,646	6,155,395	3,390,927	1,605,755	555,252	178,417	624,460	41,035,964															
MONTHLY AVAIL. SNOWMELT (IN) _{net}	0	0	0	0	0	0	10	31	15	0	0	56															
ESTIMATED SNOW CONTR. (%) _{net}	0%	0%	0%	0%	0%	100%	41%	25%	41%	0%	0%	0%															
ESTIMATED AREA OF INFLUENCE (ac)	50	50	50	50	50	50	50	50	50	50	50	38,866,747															
ESTIMATED INFLOW TO STORAGE (GAL) _{net}	0	0	0	0	0	0	13,358,202	17,114,585	8,384,861	0	0	38,866,747															
RESERVOIR DISPOSAL GAIN (GAL)	(1,759,161)	(4,257,695)	(6,395,023)	(8,275,357)	(6,633,215)	(5,868,401)	(16,111,710)	(17,211,756)	7,024,916	2,161,865	15,695,620	(37,270,121)															
IRRIGATION																											
IRRIGATION DISPOSAL (GAL) _{net}	0	0	0	0	0	0	0	0	0	0	0	58,185,000															
STORAGE																											
BEGINNING STORAGE (GAL)	0	3,007,462	8,999,493	18,718,953	31,479,042	42,145,206	53,046,489	75,288,487	80,711,788	90,845,052	81,710,347	40,788,364															
CALCULATED STORAGE GAIN (GAL)	3,007,462	5,992,031	9,719,460	12,760,089	10,666,164	10,901,294	22,241,988	23,423,301	10,133,264	-9,134,706	-40,921,983	-40,939,933															
ESTIMATED FINAL STORAGE (GAL)	3,007,462	8,999,493	18,718,953	31,479,042	42,145,206	53,046,489	75,288,487	80,711,788	90,845,052	81,710,347	40,788,364	18,000,000															
AMOUNT DISCHARGED TO BLOODS CREEK (GAL)	0	0	0	0	0	0	0	18,000,000	0	0	0	0															
PREDICTED FINAL STORAGE (GAL)	3,007,462	8,999,493	18,718,953	31,479,042	42,145,206	53,046,489	75,288,487	80,711,788	90,845,052	81,710,347	40,788,364	18,000,000															

PARAMETER / MONTH	ANNUAL OUTFLOW POTENTIAL (MG)												OVERALL BALANCE		
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL	UNCOVERED STORAGE CAPACITY (MG)	UNCOVERED STORAGE CAPACITY (MG)
EVAPORATION														0	0
PRECIPITATION														0	0
IRRIGATION														0	0
TOTAL														0	0

(a) Maximum estimated net percolation based on 2006 estimated disposal season percolation rate by month.
 (b) Reservoir water surface area is a function of storage volume at start of month.
 (c) Estimated snowmelt volume available for inflow to storage reservoir.
 (d) Estimated percentage of snowmelt contributing to inflow to reservoir.
 (e) Estimated based on fraction of accumulated snow within reservoir "area of influence" entering the reservoir during snowmelt months.
 (f) Disposal capacity based on 1-in-100 Year maximum estimated land disposal volumes.

PARAMETER / MONTH	STORAGE RESERVOIR												IRRIGATION AREA CHARACTERISTICS				CLIMATOLOGICAL FACTORS			
	DEC	NOV	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ANNUAL	PRECIP/AVG PRECIP RATIO	OCT-APR EVAP/AVG EVAP RATIO	MAY-SEP EVAP/AVG EVAP RATIO	PAN COEFFICIENT	LAND PRECIP COLLECTED (FRAC)
TREATMENT POND CHARACTERISTICS																				
GROSS AREA (ac)	3.2												21.3				80			
WATER SURFACE AREA (ac)	2.9												14.7				0/0			
FRACTION OF ESTIMATED PERC RATE	0.1												1.0				0/0			
DAYS IN MONTH	31	30	31	30	31	31	28	31	30	31	30	31	31	30	365					
AVG PAN EVAP (IN)	3.05	0.89	0.61	0.76	0.83	0.76	0.83	2.14	3.69	5.34	6.64	7.83	6.87	5.17	43.62					
AVG PRECIP (IN)	2.3	5.3	7.5	9.3	7.5	9.3	6.9	3.8	3.8	1.8	0.6	0.2	0.2	0.7	46.0					
ESTD. SNOW ACCUM (IN Water)	3	10	22	41	48	59	60	59	60	49	16	0	0	0	168.2					
ESTIMATED MAX PERCOLATION (IN) _(a)	96.1	37.5	14.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	20.1					
PROJECTED INFLUENT FLOW (AVG. GAUD)	36,413	38,021	75,704	102,039	106,243	133,082	191,582	202,799	114,600	80,899	72,837	46,072								

PARAMETER	CALCULATIONS												ANNUAL
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	
WASTEWATER VOLUME (gal)	1,128,791	1,140,622	2,346,835	3,163,195	2,974,814	4,125,557	5,747,452	6,286,757	3,438,008	2,507,875	2,257,934	1,382,160	36,500,000
EVAPORATION (IN)	1.9	0.5	0.4	0.5	0.5	1.3	2.2	4.3	5.3	6.1	5.5	4.1	32.6
PRECIPITATION (IN)	4.1	9.5	13.5	16.7	13.5	12.4	6.8	3.2	1.1	0.2	0.4	1.3	82.8
TREATMENT PONDS													
PERCOLATION (IN)	9.6	3.7	1.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	16.8
PERC VOLUME (gal)	757,089	295,268	113,490	0	0	0	0	0	0	0	0	0	1,324,227
EVAP. VOLUME (gal)	149,620	39,374	31,489	39,374	39,374	102,372	173,244	338,614	417,361	480,359	433,111	322,864	2,567,166
PRECIP. VOLUME (gal)	356,367	821,194	1,162,068	1,440,984	1,162,068	1,069,102	588,781	278,896	92,965	15,494	30,988	108,460	7,127,348
TREATMENT DISPOSAL (GAIN) (gal)	550,342	(486,553)	(1,017,079)	(1,401,590)	(1,122,694)	(966,731)	(415,537)	59,718	324,396	464,865	402,122	372,785	(8,235,955)
STORAGE RESERVOIR													
PERCOLATION (IN)	96.14	37.50	14.41	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	168.16
PERC VOLUME (gal)	4,046,509	1,576,157	606,584	0	0	0	0	0	0	0	0	0	7,077,766
W.S. AREA (ac) _(b)	1.55	1.55	1.55	1.55	2.68	7.25	10.23	12.87	17.94	11.2	9.55	1.55	15.5
EVAP. VOLUME (gal)	79,989	21,045	16,836	21,045	36,387	255,929	611,134	1,502,745	1,794,654	1,855,181	1,426,279	172,565	7,793,769
PRECIP. VOLUME (gal)	2,172,492	5,005,178	7,084,214	8,784,425	7,084,214	6,517,477	3,589,335	1,700,211	566,737	94,456	188,912	661,193	43,449,845
MONTHLY AVAIL. SNOWMELT (IN) _(c)	0	0	0	0	0	0	11	33	16	0	0	0	60
ESTIMATED SNOW CONTR. (%) _(d)	0%	0%	0%	0%	0%	0%	100%	41%	41%	25%	0%	0%	0%
ESTIMATED AREA OF INFLUENCE (ac)	50	50	50	50	50	50	50	50	50	50	50	50	50
ESTIMATED INFLOW TO STORAGE (gal) _(e)	0	0	0	0	0	0	14,313,431	18,337,055	8,983,887	0	0	0	41,634,372
RESERVOIR DISPOSAL (GAIN) (gal)	1,963,986	(3,406,976)	(6,460,794)	(8,763,381)	(7,047,827)	(6,261,548)	(17,291,631)	(18,534,521)	(7,755,970)	1,760,725	1,237,367	357,888	(70,212,681)
IRRIGATION													
IRRIGATION DISPOSAL (gal) _(f)	0	0	0	0	0	0	0	0	0	9,015,000	23,748,000	25,422,000	58,185,000
STORAGE													
BEGINNING STORAGE (gal)	0	0	5,034,150	14,858,858	28,187,024	39,332,359	50,686,194	74,140,814	67,902,374	56,271,956	47,539,241	24,409,686	2
CALCULATED STORAGE GAIN (gal)	-1,375,537	5,034,150	9,824,708	13,328,166	11,145,335	11,353,855	23,454,020	24,761,580	10,869,582	-8,732,715	-23,129,555	-24,770,513	
ESTIMATED FINAL STORAGE (gal)	0	5,034,150	14,858,858	28,187,024	39,332,359	50,686,194	74,140,814	98,902,374	78,771,956	47,539,241	24,409,686	0	
AMOUNT DISCHARGED TO BLOODS CREEK (gal)	0	0	0	0	0	0	0	0	31,000,000	22,500,000	0	0	53,500,000
PREDICTED FINAL STORAGE (GAL)	0	5,034,150	14,858,858	28,187,024	39,332,359	50,686,194	74,140,814	67,902,374	56,271,956	47,539,241	24,409,686	0	

PARAMETER	ANNUAL OUTFLOW POTENTIAL (MG)												ANNUAL
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	
WASTEWATER	36.5	50.6	41.8	128.7	10.4	8.4	58.2	130.4	74	106			
PRECIPITATION													
SNOW INFILX (MG)													
TOTAL													
OVERALL BALANCE													2
UNUSED DISPOSAL CAPACITY (MG)													32
(MUST NOT BE NEGATIVE)													
UNUSED STORAGE CAPACITY (MG)													
(MUST NOT BE NEGATIVE)													

(a) Maximum estimated net percolation based on 2006 estimated disposal season percolation rate by month.
 (b) Reservoir water surface area is a function of storage volume at start of month.
 (c) Estimated snowmelt volume available for inflow to storage reservoir.
 (d) Estimated percentage of snowmelt contributing to inflow to reservoir.
 (e) Estimated based on fraction of accumulated snow within reservoir "area of influence" entering the reservoir during snowmelt months.
 (f) Disposal capacity based on 1-in-100 Year maximum estimated land disposal volumes.

B-9

RESOLUTION NO. 482

A RESOLUTION DECLARING POLICY AS REGARDS DISCHARGE TO SURFACE WATERS BY THE BEAR VALLEY WATER DISTRICT

WHEREAS, on October 20, 2005, the California Regional Water Quality Control Board adopted Waste Discharge Requirements Order No. R5-2005-0139 for NPDES Permit No. CA0085146 governing discharge to surface waters by the Bear Valley Water District;

WHEREAS, said Waste Discharge Requirements and NPDES Permit were for a term of five years and are currently in process of being updated and renewed;

WHEREAS, said Waste Discharge Requirements and NPDES Permit as issued in 2005 included provisions requiring construction of tertiary treatment facilities, and the preliminary draft of the proposed permit as under current consideration by staff of the California Regional Water Quality Control Board contains an alternative proposal that eliminates the requirement to construct tertiary treatment facilities, but also proposes an option that continues the tertiary treatment requirement;

WHEREAS, the Bear Valley Water District has not, during the term of the permit, utilized the privilege to discharge granted by said Waste Discharge Requirements and NPDES Permit;

WHEREAS, the Bear Valley Water District has not discharged to surface waters since 1999;

WHEREAS, the Bear Valley Water District has produced engineering studies that predict discharge to surface waters will only be necessary when precipitation rates approach a one in twenty-five year return frequency;

WHEREAS, tertiary treatment, should it be required, will only be applicable to discharge to surface waters;

WHEREAS, the construction of a tertiary treatment plant would be an immense financial burden on current ratepayers for facilities that would rarely be utilized;

NOW, THEREFORE, IT IS HEREBY RESOLVED THAT:

1. The Bear Valley Water District Board of Directors sets forth the clear and unambiguous policy that land application of effluent is the District's primary and preferred method of disposal.
2. The Bear Valley Water District Board of Directors hereby declares that there will be no discharge to surface waters except as an emergency measure as deemed by the General Manager to maintain design conditions of District facilities and prevent uncontrolled releases of effluent.

RESOLUTION NO. 482

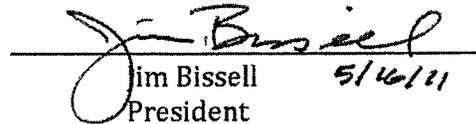
**A RESOLUTION DECLARING POLICY AS REGARDS
DISCHARGE TO SURFACE WATERS
BY THE BEAR VALLEY WATER DISTRICT**

PASSED AND ADOPTED this 16th day of May 2011 by the following vote of the Board of Directors of the Bear Valley Water District, to wit:

AYES, and in favor thereof: Bissell, Coffmann, Dralla, Goodrich, Nelson

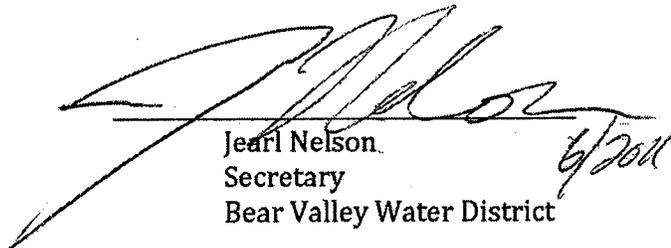
NOES: None

ABSENT: None



Jim Bissell 5/16/11
President
Bear Valley Water District

I hereby certify that this is a correct copy of the foregoing resolution that was duly and regularly passed and adopted by the Board of Directors of the Bear Valley Water District, Alpine County, California, at a meeting thereof held on the 16th day of May 2011



Jearl Nelson
Secretary
Bear Valley Water District 6/2011